

1 Michael C. Murphy, Esq. (S.B. No. 104872)
2 Michael@murphlaw.net
3 Michael C. Murphy, Jr. Esq. (S.B. No. 305896)
4 Michael.jr@murphlaw.net
5 LAW OFFICES OF MICHAEL C. MURPHY
6 2625 Townsgate Road, Suite 330
7 Westlake Village, CA 91361
8 Tel.: 818-558-3718
9 Fax: 805-367-4506

8 Attorneys for Defendant,
9 Patrick Byrne

10 **UNITED STATES DISTRICT COURT**
11
CENTRAL DISTRICT OF CALIFORNIA

12 ROBERT HUNTER BIDEN, an
13 individual,

14 Plaintiff,

15 vs.

16 PATRICK M. BYRNE, an individual,

17 Defendant.

18 } Case No.: 2:23-cv-09430-SVW-PD
19 } Judge: Honorable Stephen V. Wilson
20 } Courtroom: "10A"

21 }
22 } **EVIDENTIARY OBJECTIONS TO**
23 } **PLAINTIFF'S DECLARATION**
24 } **AND EXHIBITS FILED IN**
25 } **SUPPORT OF PLAINTIFF'S**
26 } **OPPOSITION TO DEFENDANT'S**
27 } **MOTION FOR SUMMARY**
28 } **JUDGMENT**

29 }
30 } [Filed concurrently with Defendant's
31 } Reply; Defendant's Response to
32 } Plaintiff's Additional Controverted
33 } Facts; Defendant's Response to
34 } Plaintiff's Disputed Facts; Declaration
35 } of Michael C. Murphy]
36 }

37 Date: November 25, 2024
38 Time: 1:30 p.m.
1 Courtroom: "10A"

EVIDENTIARY OBJECTIONS TO PLAINTIFF'S DECLARATION AND EXHIBITS FILED IN SUPPORT OF
PLAINTIFF'S OPPOSITION TO DEFENDANT'S MOTION FOR SUMMARY JUDGMENT

Case No. 2:23-cv-09430-SVW-PD

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

Defendant Patrick Bryne here submits to the court the following evidentiary objections to the evidence cited by Plaintiff Robert Hunter Biden in support of her motion for summary judgment as follows:

OBJECTION NO. 1

Material Objected to:

“Attached hereto as **Exhibit “3”** is a true and correct copy of a screenshot I obtained of Defendant’s post on his publicly available Telegram account dated March 20, 2022, and which was produced in discovery by Plaintiff and bates labeled as RHB00695.” (Declaration of Zachary Hansen, ¶4, lines 20-23.)

Grounds for Objection:

Objection. Irrelevant. Improper character evidence. Lacks foundation. Lacks authenticity. No testimony from any person responsible for creating the internet-based document attesting to how the material was prepared or its accuracy. No personal knowledge of the declarant of who maintains the website, who authored the documents or accuracy of the contents. (FRE §§ 401-404, 901; *United States v Tank* (9th Cir. 2000) 200 F.3d 627, 630-631; *Wady v Provident Life & Accidents Ins. Co. of America* (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)

OBJECTION NO. 2

Material Objected to:

“Exhibit “3”. (Declaration of Zachary Hansen, ¶4, lines 20-23.)

Grounds for Objection:

Objection. Irrelevant. Lacks foundation. Lacks authenticity. No testimony from any person responsible for creating the internet-based document attesting to how the material was prepared or its accuracy. No personal knowledge of the declarant of who maintains the website,

1 who authored the documents or accuracy of the contents. (FRE§§ 401-404, 901; *United States*
2 *v Tank* (9th Cir. 2000) 200 F.3d 627, 630-631; *Wady v Provident Life & Accidents Ins. Co. of*
3 *America* (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)

4

5 **OBJECTION NO. 3**

6 **Material Objected to:**

7 “Attached hereto as **Exhibit “4”** is a true and correct copy of a screenshot I obtained of
8 Defendant’s post on his publicly available Telegram account dated April 7, 2022, and which
9 was produced in discovery by Plaintiff and bates labeled as RHB00696.” (Declaration of
10 Zachary Hansen, ¶5, line 24-27)

11 **Grounds for Objection:**

12 Objection. Irrelevant. Improper character evidence. Lacks foundation. Lacks
13 authenticity. No testimony from any person responsible for creating the internet-based
14 document attesting to how the material was prepared or its accuracy. No personal knowledge of
15 the declarant of who maintains the website, who authored the documents or accuracy of the
16 contents. (FRE§§ 401-404, 901; *United States v Tank* (9th Cir. 2000) 200 F.3d 627, 630-631;
17 *Wady v Provident Life & Accidents Ins. Co. of America* (CD CA 2002) 216 F.Supp.2d 1060,
18 1064-1065.)

19

20 **OBJECTION NO. 4**

21 **Material Objected to:**

22 “**Exhibit “4”.**” (Declaration of Zachary Hansen, ¶5, line 24-27)

23 **Grounds for Objection:**

24 Objection. Irrelevant. Improper character evidence. Lacks foundation. Lacks
25 authenticity. No testimony from any person responsible for creating the internet-based
26 document attesting to how the material was prepared or its accuracy. No personal knowledge of
27 the declarant of who maintains the website, who authored the documents or accuracy of the
28 contents. (FRE§§ 401-404, 901; *United States v Tank* (9th Cir. 2000) 200 F.3d 627, 630-631;

1 *Wady v Provident Life & Accidents Ins. Co. of America* (CD CA 2002) 216 F.Supp.2d 1060,
2 1064-1065.)
3
4

OBJECTION NO. 5

Material Objected to:

6 “Attached hereto as **Exhibit “5”** is a true and correct copy of a screenshot I obtained of
7 Defendant’s post on his publicly available Telegram account dated October 20, 2022, and
8 which was produced in discovery by Plaintiff and bates labeled as RHB00697.” (Declaration of
9 Zachary Hansen, ¶6, lines 1-4.)

Grounds for Objection:

11 Objection. Misrepresents the evidence because the exhibit displays no social media
12 account name or poster. Irrelevant. Improper character evidence. Lacks foundation. Lacks
13 authenticity. No testimony from any person responsible for creating the internet-based
14 document attesting to how the material was prepared or its accuracy. No personal knowledge of
15 the declarant of who maintains the website, who authored the documents or accuracy of the
16 contents. (FRE §§ 401-404, 901; *United States v Tank* (9th Cir. 2000) 200 F.3d 627, 630-631;
17 *Wady v Provident Life & Accidents Ins. Co. of America* (CD CA 2002) 216 F.Supp.2d 1060,
18 1064-1065.)
19
20

OBJECTION NO. 6

Material Objected to:

22 “**Exhibit “5”.**” (Declaration of Zachary Hansen, ¶6, lines 1-4.)

Grounds for Objection:

24 Objection. Misrepresents the evidence because the exhibit displays no social
25 media account name or poster. Irrelevant. Improper character evidence. Lacks foundation.
26 Lacks authenticity. No testimony from any person responsible for creating the internet-based
27 document attesting to how the material was prepared or its accuracy. No personal knowledge of
28 the declarant of who maintains the website, who authored the documents or accuracy of the
4

1 contents. (FRE§§ 401-404, 901; *United States v Tank* (9th Cir. 2000) 200 F.3d 627, 630-631;
2 *Wady v Provident Life & Accidents Ins. Co. of America* (CD CA 2002) 216 F.Supp.2d 1060,
3 1064-1065.)

4 **OBJECTION NO. 7**

5 **Material Objected to:**

6 “Attached hereto as Exhibit “6” is a true and correct copy of a screenshot I obtained of
7 Defendant’s post on his publicly available Telegram account dated December 12, 2022, and
8 which was produced in discovery by Plaintiff and bates labeled as RHB00698.” (Declaration of
9 Zachary Hansen, ¶7, lines 5-8.)

10 **Grounds for Objection:**

11 Objection. Irrelevant. Improper character evidence. Lacks foundation. Lacks
12 authenticity. No testimony from any person responsible for creating the internet-based
13 document attesting to how the material was prepared or its accuracy. No personal knowledge of
14 the declarant of who maintains the website, who authored the documents or accuracy of the
15 contents. (FRE§§ 401-404, 901; *United States v Tank* (9th Cir. 2000) 200 F.3d 627, 630-631;
16 *Wady v Provident Life & Accidents Ins. Co. of America* (CD CA 2002) 216 F.Supp.2d 1060,
17 1064-1065.)

18
19 **OBJECTION NO. 8**

20 **Material Objected to:**

21 “Attached hereto as **Exhibit “7”** is a true and correct copy of a screenshot I obtained of
22 Defendant’s post on his publicly available X (formerly known as Twitter) account dated
23 February 10, 2023, and which was produced in discovery by Plaintiff and bates labeled as
24 RHB00699.” (Declaration of Zachary Hansen, ¶8, lines 9-12.)

25 **Grounds for Objection:**

26 Objection. Irrelevant. Improper character evidence. Lacks foundation. Lacks
27 authenticity. No testimony from any person responsible for creating the internet-based
28 document attesting to how the material was prepared or its accuracy. No personal knowledge of
5

1 the declarant of who maintains the website, who authored the documents or accuracy of the
2 contents. (FRE §§ 401-404, 901; *United States v Tank* (9th Cir. 2000) 200 F.3d 627, 630-631;
3 *Wady v Provident Life & Accidents Ins. Co. of America* (CD CA 2002) 216 F.Supp.2d 1060,
4 1064-1065.)
5

6 **OBJECTION NO. 9**

7 **Material Objected to:**

8 "Exhibit "7". (Declaration of Zachary Hansen, ¶8, lines 9-12.)

9 **Grounds for Objection:**

10 Objection. Irrelevant. Improper character evidence. Lacks foundation. Lacks
11 authenticity. No testimony from any person responsible for creating the internet-based
12 document attesting to how the material was prepared or its accuracy. No personal knowledge of
13 the declarant of who maintains the website, who authored the documents or accuracy of the
14 contents. (FRE §§ 401-404, 901; *United States v Tank* (9th Cir. 2000) 200 F.3d 627, 630-631;
15 *Wady v Provident Life & Accidents Ins. Co. of America* (CD CA 2002) 216 F.Supp.2d 1060,
16 1064-1065.)
17

18 **OBJECTION NO. 10**

19 **Material Objected to:**

20 "Attached hereto as Exhibit "8" is a true and correct copy of a screenshot I obtained of
21 Defendant's post on his publicly available X (formerly known as Twitter) account dated
22 February 12, 2023, including associated comments, and which was produced in discovery by
23 Plaintiff and bates labeled as RHB00700." (Declaration of Zachary Hansen, ¶9, lines 12-16.)

24 **Grounds for Objection:**

25 Objection. Irrelevant. Improper character evidence. Lacks foundation. Lacks
26 authenticity. No testimony from any person responsible for creating the internet-based
27 document attesting to how the material was prepared or its accuracy. No personal knowledge of
28 the declarant of who maintains the website, who authored the documents or accuracy of the
6

1 contents. (FRE§§ 401-404, 901; *United States v Tank* (9th Cir. 2000) 200 F.3d 627, 630-631;
2 *Wady v Provident Life & Accidents Ins. Co. of America* (CD CA 2002) 216 F.Supp.2d 1060,
3 1064-1065.)

4

5 **OBJECTION NO. 11**

6 **Material Objected to:**

7 “Exhibit “8”.” (Declaration of Zachary Hansen, ¶9, lines 12-16.)

8 **Grounds for Objection:**

9 Objection. Irrelevant. Improper character evidence. Lacks foundation. Lacks
10 authenticity. No testimony from any person responsible for creating the internet-based
11 document attesting to how the material was prepared or its accuracy. No personal knowledge of
12 the declarant of who maintains the website, who authored the documents or accuracy of the
13 contents. (FRE§§ 401-404, 901; *United States v Tank* (9th Cir. 2000) 200 F.3d 627, 630-631;
14 *Wady v Provident Life & Accidents Ins. Co. of America* (CD CA 2002) 216 F.Supp.2d 1060,
15 1064-1065.)

16

17 **OBJECTION NO. 12**

18 **Material Objected to:**

19 “Attached hereto as Exhibit “9” is a true and correct copy of a screenshot I obtained of
20 Defendant’s post on his publicly available X (formerly known as Twitter) account dated
21 February 24, 2023, and which was produced in discovery by Plaintiff and bates labeled as
22 RHB00701.” (Declaration of Zachary Hansen, ¶10, lines 17-20.)

23 **Grounds for Objection:**

24 Objection. Irrelevant. Improper character evidence. Lacks foundation. Lacks
25 authenticity. No testimony from any person responsible for creating the internet-based
26 document attesting to how the material was prepared or its accuracy. No personal knowledge of
27 the declarant of who maintains the website, who authored the documents or accuracy of the
28 contents. (FRE§§ 401-404, 901; *United States v Tank* (9th Cir. 2000) 200 F.3d 627, 630-631;

1 *Wady v Provident Life & Accidents Ins. Co. of America* (CD CA 2002) 216 F.Supp.2d 1060,
2 1064-1065.)
3
4

OBJECTION NO. 13

Material Objected to:

6 “Exhibit “9”.” (Declaration of Zachary Hansen, ¶10, lines 17-20.)

Grounds for Objection:

8 Objection. Irrelevant. Improper character evidence. Lacks foundation. Lacks
9 authenticity. No testimony from any person responsible for creating the internet-based
10 document attesting to how the material was prepared or its accuracy. No personal knowledge of
11 the declarant of who maintains the website, who authored the documents or accuracy of the
12 contents. (FRE §§ 401-404, 901; *United States v Tank* (9th Cir. 2000) 200 F.3d 627, 630-631;
13 *Wady v Provident Life & Accidents Ins. Co. of America* (CD CA 2002) 216 F.Supp.2d 1060,
14 1064-1065.)
15
16

OBJECTION NO. 14

Material Objected to:

18 “Attached hereto as Exhibit “10” is a true and correct copy of a screenshot I obtained
19 of Defendant’s post on his publicly available X (formerly known as Twitter) account dated
20 March 17, 2023, including associated comments, and which was produced in discovery by
21 Plaintiff and bates labeled as RHB00702.” (Declaration of Zachary Hansen, ¶11, lines 21-24.)

Grounds for Objection:

23 Objection. Irrelevant. Improper character evidence. Lacks foundation. Lacks
24 authenticity. No testimony from any person responsible for creating the internet-based
25 document attesting to how the material was prepared or its accuracy. No personal knowledge of
26 the declarant of who maintains the website, who authored the documents or accuracy of the
27 contents. (FRE §§ 401-404, 901; *United States v Tank* (9th Cir. 2000) 200 F.3d 627, 630-631;
28 *Wady v Provident Life & Accidents Ins. Co. of America* (CD CA 2002) 216 F.Supp.2d 1060,
8

1 1064-1065.)
2

3 **OBJECTION NO. 15**

4 **Material Objected to:**

5 “Exhibit “10”.” (Declaration of Zachary Hansen, ¶11, lines 21-24.)

6 **Grounds for Objection:**

7 Objection. Irrelevant. Improper character evidence. Lacks foundation. Lacks
8 authenticity. No testimony from any person responsible for creating the internet-based
9 document attesting to how the material was prepared or its accuracy. No personal knowledge of
10 the declarant of who maintains the website, who authored the documents or accuracy of the
11 contents. (FRE §§ 401-404, 901; *United States v Tank* (9th Cir. 2000) 200 F.3d 627, 630-631;
12 *Wady v Provident Life & Accidents Ins. Co. of America* (CD CA 2002) 216 F.Supp.2d 1060,
13 1064-1065.)
14

15 **OBJECTION NO. 16**

16 **Material Objected to:**

17 “Attached hereto as Exhibit “11” is a true and correct copy of a screenshot I obtained
18 of Defendant’s post on his publicly available X (formerly known as Twitter) account dated
19 March 28, 2023, and which was produced in discovery by Plaintiff and bates labeled as
20 RHB00110.” (Declaration of Zachary Hansen, ¶12, lines 25-28.)

21 **Grounds for Objection:**

22 Objection. Irrelevant. Improper character evidence. Lacks foundation. Lacks
23 authenticity. No testimony from any person responsible for creating the internet-based
24 document attesting to how the material was prepared or its accuracy. No personal knowledge of
25 the declarant of who maintains the website, who authored the documents or accuracy of the
26 contents. (FRE §§ 401-404, 901; *United States v Tank* (9th Cir. 2000) 200 F.3d 627, 630-631;
27 *Wady v Provident Life & Accidents Ins. Co. of America* (CD CA 2002) 216 F.Supp.2d 1060,
28 1064-1065.)

OBJECTION NO. 17

Material Objected to:

“Exhibit “11”.” (Declaration of Zachary Hansen, ¶12, lines 25-28.)

Grounds for Objection:

Objection. Irrelevant. Improper character evidence. Lacks foundation. Lacks authenticity. No testimony from any person responsible for creating the internet-based document attesting to how the material was prepared or its accuracy. No personal knowledge of the declarant of who maintains the website, who authored the documents or accuracy of the contents. (FRE§§ 401-404, 901; *United States v Tank* (9th Cir. 2000) 200 F.3d 627, 630-631; *Wady v Provident Life & Accidents Ins. Co. of America* (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)

OBJECTION NO. 18

Material Objected to:

“Attached hereto as **Exhibit “12”** is a true and correct copy of a screenshot I obtained of Defendant’s post on his publicly available X (formerly known as Twitter) account dated May 12, 2023, and which was produced in discovery by Plaintiff and bates labeled as RHB00101.” (Declaration of Zachary Hansen, ¶13, lines 1-4.)

Grounds for Objection:

Objection. Irrelevant. Improper character evidence. Lacks foundation. Lacks authenticity. No testimony from any person responsible for creating the internet-based document attesting to how the material was prepared or its accuracy. No personal knowledge of the declarant of who maintains the website, who authored the documents or accuracy of the contents. (FRE §§ 401-404, 901; *United States v Tank* (9th Cir. 2000) 200 F.3d 627, 630-631; *Wady v Provident Life & Accidents Ins. Co. of America* (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)

OBJECTION NO. 19

Material Objected to:

“Exhibit “12”.” (Declaration of Zachary Hansen, ¶13, lines 1-4.)

Grounds for Objection:

Objection. Irrelevant. Improper character evidence. Lacks foundation. Lacks authenticity. No testimony from any person responsible for creating the internet-based document attesting to how the material was prepared or its accuracy. No personal knowledge of the declarant of who maintains the website, who authored the documents or accuracy of the contents. (FRE §§ 401-404, 901; *United States v Tank* (9th Cir. 2000) 200 F.3d 627, 630-631; *Wady v Provident Life & Accidents Ins. Co. of America* (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)

OBJECTION NO. 20

Material Objected to:

“Attached hereto as **Exhibit “13”** is a true and correct copy of a screenshot I obtained of Defendant’s post on his publicly available Telegram account dated June 24, 2023, and which was produced in discovery by Plaintiff and bates labeled as RHB00703.” (Declaration of Zachary Hansen, ¶14, lines 5-8.)

Grounds for Objection:

Objection. Irrelevant. Improper character evidence. Lacks foundation. Lacks authenticity. No testimony from any person responsible for creating the internet-based document attesting to how the material was prepared or its accuracy. No personal knowledge of the declarant of who maintains the website, who authored the documents or accuracy of the contents. (FRE §§ 401-404, 901; *United States v Tank* (9th Cir. 2000) 200 F.3d 627, 630-631; *Wady v Provident Life & Accidents Ins. Co. of America* (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)

OBJECTION NO. 21

1 | Material Objected to:

“Exhibit “13”.” (Declaration of Zachary Hansen, ¶14, lines 5-8.)

3 | Grounds for Objection:

4 Objection. Irrelevant. Improper character evidence. Lacks foundation. Lacks
5 authenticity. No testimony from any person responsible for creating the internet-based
6 document attesting to how the material was prepared or its accuracy. No personal knowledge of
7 the declarant of who maintains the website, who authored the documents or accuracy of the
8 contents. (FRE §§ 401-404, 901; *United States v Tank* (9th Cir. 2000) 200 F.3d 627, 630-631;
9 *Wady v Provident Life & Accidents Ins. Co. of America* (CD CA 2002) 216 F.Supp.2d 1060,
10 1064-1065.)

OBJECTION NO. 22

13 | Material Objected to:

14 “Attached hereto as **Exhibit “14”** is a true and correct copy of a screenshot I obtained
15 of a publicly available video file of the May 10, 2023 episode of *The Absolute Truth with*
16 *Emerald Robinson* with the caption “Patrick Byrne Drops Bombshell Allegations Regarding
17 Hunter Biden and Iran” from [https://rumble.com/v2nal20-patrick-byrne-drops-bombshell-](https://rumble.com/v2nal20-patrick-byrne-drops-bombshell-allegations-regarding-hunter-biden-and-iran.html?e9s=rel_v1_b)
18 [allegations-regarding-hunter-biden-and-iran.html?e9s=rel_v1_b](https://rumble.com/v2nal20-patrick-byrne-drops-bombshell-allegations-regarding-hunter-biden-and-iran.html?e9s=rel_v1_b), and which was produced in
19 discovery by Plaintiff and bates labeled as RHB00186.” (Declaration of Zachary Hansen, ¶15,
20 lines 9-15.)

21 | **Grounds for Objection:**

22 Objection. Irrelevant. Improper character evidence. Lacks foundation. Lacks
23 authenticity. No testimony from any person responsible for creating the internet-based
24 document attesting to how the material was prepared or its accuracy. No personal knowledge of
25 the declarant of who maintains the website, who authored the documents or accuracy of the
26 contents. (FRE §§ 401-404, 901; *United States v Tank* (9th Cir. 2000) 200 F.3d 627, 630-631;
27 *Wady v Provident Life & Accidents Ins. Co. of America* (CD CA 2002) 216 F.Supp.2d 1060,
28 1064-1065.)

OBJECTION NO. 23

Material Objected to:

“Exhibit “14”.” (Declaration of Zachary Hansen, ¶15, lines 9-15.)

Grounds for Objection:

Objection. Irrelevant. Improper character evidence. Lacks foundation. Lacks authenticity. No testimony from any person responsible for creating the internet-based document attesting to how the material was prepared or its accuracy. No personal knowledge of the declarant of who maintains the website, who authored the documents or accuracy of the contents. (FRE §§ 401-404, 901; *United States v Tank* (9th Cir. 2000) 200 F.3d 627, 630-631; *Wady v Provident Life & Accidents Ins. Co. of America* (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)

OBJECTION NO. 24

Material Objected to:

“Attached hereto as **Exhibit “15”** is a true and correct copy of a screenshot I obtained of a publicly available video file of the May 11, 2023 episode of *The Absolute Truth with Emerald Robinson* from <https://rumble.com/v2n9tpy-the-absolute-truth-with-emerald-robinson-may-11-2023.html>, and which was produced in discovery by Plaintiff and bates labeled as RHB00187.” (Declaration of Zachary Hansen, ¶16, lines 16-20.)

Grounds for Objection:

Objection. Irrelevant. Improper character evidence. Lacks foundation. Lacks authenticity. No testimony from any person responsible for creating the internet-based document attesting to how the material was prepared or its accuracy. No personal knowledge of the declarant of who maintains the website, who authored the documents or accuracy of the contents. (FRE §§ 401-404, 901; *United States v Tank* (9th Cir. 2000) 200 F.3d 627, 630-631; *Wady v Provident Life & Accidents Ins. Co. of America* (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)

1 ||| 1

OBJECTION NO. 25

Material Objected to:

“Exhibit “15”.” (Declaration of Zachary Hansen, ¶16, lines 16-20.)

Grounds for Objection:

Objection. Irrelevant. Improper character evidence. Lacks foundation. Lacks authenticity. No testimony from any person responsible for creating the internet-based document attesting to how the material was prepared or its accuracy. No personal knowledge of the declarant of who maintains the website, who authored the documents or accuracy of the contents. (FRE §§ 401-404, 901; *United States v Tank* (9th Cir. 2000) 200 F.3d 627, 630-631; *Wady v Provident Life & Accidents Ins. Co. of America* (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)

OBJECTION NO. 36

Material Objected to:

“Attached hereto as **Exhibit “16”** are true and correct copies of relevant portions of a transcript of the publicly available May 11, 2023 episode of *The Absolute Truth with Emerald Robinson*, which was prepared at my direction by Plaintiff’s counsel’s office, and which was produced in discovery by Plaintiff and bates labeled as RHB00711-RHB00715. I have reviewed the transcript and listened to the foregoing episode and confirm that the transcript is accurate.” (Declaration of Zachary Hansen, ¶14, lines 21-26.)

Grounds for Objection:

Objection. Irrelevant. Improper character evidence. Lacks foundation. Lacks authenticity. No testimony from any person responsible for creating the internet-based document attesting to how the material was prepared or its accuracy. No personal knowledge of the declarant of who maintains the website, who authored the documents or accuracy of the contents. No admissible testimony or evidence of transcriber as to the accuracy or correctness of the transcription, despite obvious spelling errors, and gaps in the transcription. (FRE §§ 401-¹⁴

1 404, 901; 901(a)-(b) and 104(b); *United States v Tank* (9th Cir. 2000) 200 F.3d 627, 630-631;
2 *Wady v Provident Life & Accidents Ins. Co. of America* (CD CA 2002) 216 F.Supp.2d 1060,
3 1064-1065; See *Snyder v CitiSteel USA Inc.* (D. Del. 2007) 508 F.Supp.2d 407, 412-413.)

4

5 **OBJECTION NO. 27**

6 **Material Objected to:**

7 “Exhibit “16”.” (Declaration of Zachary Hansen, ¶14, lines 21-26.)

8 **Grounds for Objection:**

9 Objection. Irrelevant. Improper character evidence. Lacks foundation. Lacks
10 authenticity. No testimony from any person responsible for creating the internet-based
11 document attesting to how the material was prepared or its accuracy. No personal knowledge of
12 the declarant of who maintains the website, who authored the documents or accuracy of the
13 contents. No admissible testimony or evidence of transcriber as to the accuracy or correctness
14 of the transcription, despite obvious spelling errors, and gaps in the transcription. (FRE §§ 401-
15 404, 901; 901(a)-(b) and 104(b); *United States v Tank* (9th Cir. 2000) 200 F.3d 627, 630-631;
16 *Wady v Provident Life & Accidents Ins. Co. of America* (CD CA 2002) 216 F.Supp.2d 1060,
17 1064-1065; See *Snyder v CitiSteel USA Inc.* (D. Del. 2007) 508 F.Supp.2d 407, 412-413.)

18

19 **OBJECTION NO. 28**

20 **Material Objected to:**

21 “Attached hereto as Exhibit “17” are true and correct copies of multiple screenshots I
22 obtained of Defendant’s post on his publicly available X (formerly known as Twitter) account
23 dated May 12, 2023, including associated comments, and which were produced in discovery by
24 Plaintiff and bates labeled as RHB00102-RHB00103, RHB00112-RHB00117.” (Declaration of
25 Zachary Hansen, ¶18, lines 1-5.)

26 **Grounds for Objection:**

27 Objection. Irrelevant. Improper character evidence. Hearsay. Lacks foundation.
28 Lacks authenticity. No testimony from any person responsible for creating the internet-based

1 document attesting to how the material was prepared or its accuracy. No personal knowledge of
2 the declarant of who maintains the website, who authored the documents or accuracy of the
3 contents. (FRE§§ 401-404, 801; 901; *United States v Tank* (9th Cir. 2000) 200 F.3d 627, 630-
4 631; *Wady v Provident Life & Accidents Ins. Co. of America* (CD CA 2002) 216 F.Supp.2d
5 1060, 1064-1065.)

6

7 **OBJECTION NO. 29**

8 **Material Objected to:**

9 “Exhibit “17”.” (Declaration of Zachary Hansen, ¶18, lines 1-5.)

10 **Grounds for Objection:**

11 Objection. Irrelevant. Improper character evidence. Hearsay. Lacks foundation.
12 Lacks authenticity. No testimony from any person responsible for creating the internet-based
13 document attesting to how the material was prepared or its accuracy. No personal knowledge of
14 the declarant of who maintains the website, who authored the documents or accuracy of the
15 contents. (FRE§§ 401-404, 801; 901; *United States v Tank* (9th Cir. 2000) 200 F.3d 627, 630-
16 631; *Wady v Provident Life & Accidents Ins. Co. of America* (CD CA 2002) 216 F.Supp.2d
17 1060, 1064-1065.)

18

19 **OBJECTION NO. 30**

20 **Material Objected to:**

21 “Attached hereto as Exhibit “18” is a true and correct copy of a screenshot I obtained
22 of Defendant’s post on his publicly available Telegram account dated June 27, 2023, and which
23 was produced in discovery by Plaintiff and bates labeled as RHB00152.” (Declaration of
24 Zachary Hansen, ¶18, lines 6-9.)

25 **Grounds for Objection:**

26 Objection. Irrelevant. Improper character evidence. Lacks foundation. Lacks
27 authenticity. No testimony from any person responsible for creating the internet-based
28 document attesting to how the material was prepared or its accuracy. No personal knowledge of
16

1 the declarant of who maintains the website, who authored the documents or accuracy of the
2 contents. (FRE§§ 401-404, 901; *United States v Tank* (9th Cir. 2000) 200 F.3d 627, 630-631;
3 *Wady v Provident Life & Accidents Ins. Co. of America* (CD CA 2002) 216 F.Supp.2d 1060,
4 1064-1065.)
5

6 **OBJECTION NO. 31**

7 **Material Objected to:**

8 "Exhibit "18"." (Declaration of Zachary Hansen, ¶18, lines 6-9.)

9 **Grounds for Objection:**

10 Objection. Irrelevant. Improper character evidence. Lacks foundation. Lacks
11 authenticity. No testimony from any person responsible for creating the internet-based
12 document attesting to how the material was prepared or its accuracy. No personal knowledge of
13 the declarant of who maintains the website, who authored the documents or accuracy of the
14 contents. (FRE§§ 401-404, 901; *United States v Tank* (9th Cir. 2000) 200 F.3d 627, 630-631;
15 *Wady v Provident Life & Accidents Ins. Co. of America* (CD CA 2002) 216 F.Supp.2d 1060,
16 1064-1065.)
17

18 **OBJECTION NO. 32**

19 **Material Objected to:**

20 "Attached hereto as Exhibit "19" is a true and correct copy of a screenshot I obtained
21 of Defendant's post on his publicly available Telegram account dated June 27, 2023, and which
22 was produced in discovery by Plaintiff and bates labeled as RHB00153." (Declaration of
23 Zachary Hansen, ¶20, lines 10-13.)

24 **Grounds for Objection:**

25 Objection. Irrelevant. Improper character evidence. Lacks foundation. Lacks
26 authenticity. No testimony from any person responsible for creating the internet-based
27 document attesting to how the material was prepared or its accuracy. No personal knowledge of
28 the declarant of who maintains the website, who authored the documents or accuracy of the
17

1 contents. (FRE§§ 401-404, 901; *United States v Tank* (9th Cir. 2000) 200 F.3d 627, 630-631;
2 *Wady v Provident Life & Accidents Ins. Co. of America* (CD CA 2002) 216 F.Supp.2d 1060,
3 1064-1065.)

4

5 **OBJECTION NO. 33**

6 **Material Objected to:**

7 “Exhibit “19”.” (Declaration of Zachary Hansen, ¶20, lines 10-13.)

8 **Grounds for Objection:**

9 Objection. Irrelevant. Improper character evidence. Lacks foundation. Lacks
10 authenticity. No testimony from any person responsible for creating the internet-based
11 document attesting to how the material was prepared or its accuracy. No personal knowledge of
12 the declarant of who maintains the website, who authored the documents or accuracy of the
13 contents. (FRE§§ 401-404, 901; *United States v Tank* (9th Cir. 2000) 200 F.3d 627, 630-631;
14 *Wady v Provident Life & Accidents Ins. Co. of America* (CD CA 2002) 216 F.Supp.2d 1060,
15 1064-1065.)

16

17 **OBJECTION NO. 34**

18 **Material Objected to:**

19 “Attached hereto as **Exhibit “20”** is a true and correct copy of a screenshot I obtained
20 of Defendant’s post on his publicly available Telegram account dated June 28, 2023, and which
21 was produced in discovery by Plaintiff and bates labeled as RHB00157.” (Declaration of
22 Zachary Hansen, ¶21, lines 14-17.)

23 **Grounds for Objection:**

24 Objection. Irrelevant. Improper character evidence. Lacks foundation. Lacks
25 authenticity. No testimony from any person responsible for creating the internet-based
26 document attesting to how the material was prepared or its accuracy. No personal knowledge of
27 the declarant of who maintains the website, who authored the documents or accuracy of the
28 contents. (FRE§§ 401-404, 901; *United States v Tank* (9th Cir. 2000) 200 F.3d 627, 630-631;

¹ *Wady v Provident Life & Accidents Ins. Co. of America* (CD CA 2002) 216 F.Supp.2d 1060,
² 1064-1065.)

OBJECTION NO. 35

Material Objected to:

“Exhibit “20”.” (Declaration of Zachary Hansen, ¶21, lines 14-17.)

Grounds for Objection:

Objection. Irrelevant. Improper character evidence. Lacks foundation. Lacks authenticity. No testimony from any person responsible for creating the internet-based document attesting to how the material was prepared or its accuracy. No personal knowledge of the declarant of who maintains the website, who authored the documents or accuracy of the contents. (FRE §§ 401-404, 901; *United States v Tank* (9th Cir. 2000) 200 F.3d 627, 630-631; *Wady v Provident Life & Accidents Ins. Co. of America* (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)

OBJECTION NO. 36

Material Objected to:

“Attached hereto as **Exhibit “21”** are true and correct copies of multiple screenshots I obtained of Defendant’s post on his publicly available X (formerly known as Twitter) account dated June 29, 2023, including associated comments, and which was produced in discovery by Plaintiff and bates labeled as RHB00105-RHB00106.” (Declaration of Zachary Hansen, ¶22, lines 18-22.)

Grounds for Objection:

Objection. Irrelevant. Improper character evidence. Hearsay. Lacks foundation. Lacks authenticity. No testimony from any person responsible for creating the internet-based document attesting to how the material was prepared or its accuracy. No personal knowledge of the declarant of who maintains the website, who authored the documents or accuracy of the contents. (FRE §§ 401-404, 801, 901; *United States v Tank* (9th Cir. 2000) 200 F.3d 627, 630-¹⁹

1 631; *Wady v Provident Life & Accidents Ins. Co. of America* (CD CA 2002) 216 F.Supp.2d
2 1060, 1064-1065.)
3
4

OBJECTION NO. 37

Material Objected to:

6 "Exhibit "21"." (Declaration of Zachary Hansen, ¶22, lines 18-22.)

Grounds for Objection:

8 Objection. Irrelevant. Improper character evidence. Hearsay. Lacks foundation.
9 Lacks authenticity. No testimony from any person responsible for creating the internet-based
10 document attesting to how the material was prepared or its accuracy. No personal knowledge of
11 the declarant of who maintains the website, who authored the documents or accuracy of the
12 contents. (FRE §§ 401-404, 801, 901; *United States v Tank* (9th Cir. 2000) 200 F.3d 627, 630-
13 631; *Wady v Provident Life & Accidents Ins. Co. of America* (CD CA 2002) 216 F.Supp.2d
14 1060, 1064-1065.)
15
16

OBJECTION NO. 38

Material Objected to:

18 "Attached hereto as Exhibit "22" is a true and correct copy of a screenshot I obtained
19 of Defendant's posts on his publicly available Telegram account dated July 4, 2023, and which
20 was produced in discovery by Plaintiff and bates labeled as RHB00156." (Declaration of
21 Zachary Hansen, ¶23, lines 23-26.)

Grounds for Objection:

23 Objection. Irrelevant. Improper character evidence. Lacks foundation. Lacks
24 authenticity. No testimony from any person responsible for creating the internet-based
25 document attesting to how the material was prepared or its accuracy. No personal knowledge of
26 the declarant of who maintains the website, who authored the documents or accuracy of the
27 contents. (FRE §§ 401-404, 901; *United States v Tank* (9th Cir. 2000) 200 F.3d 627, 630-631;
28 *Wady v Provident Life & Accidents Ins. Co. of America* (CD CA 2002) 216 F.Supp.2d 1060,
20

1 1064-1065.)

2

3 **OBJECTION NO. 39**

4 **Material Objected to:**

5 “Exhibit “22”.” (Declaration of Zachary Hansen, ¶23, lines 23-26.)

6 **Grounds for Objection:**

7 Objection. Irrelevant. Improper character evidence. Lacks foundation. Lacks
8 authenticity. No testimony from any person responsible for creating the internet-based
9 document attesting to how the material was prepared or its accuracy. No personal knowledge of
10 the declarant of who maintains the website, who authored the documents or accuracy of the
11 contents. (FRE §§ 401-404, 901; *United States v Tank* (9th Cir. 2000) 200 F.3d 627, 630-631;
12 *Wady v Provident Life & Accidents Ins. Co. of America* (CD CA 2002) 216 F.Supp.2d 1060,
13 1064-1065.)

14

15 **OBJECTION NO. 40**

16 **Material Objected to:**

17 “Attached hereto as Exhibit “23” is a true and correct copy of a screenshot I obtained
18 of Defendant’s posts on his publicly available Telegram account dated July 5, 2023, and which
19 was produced in discovery by Plaintiff and bates labeled as RHB00161.” (Declaration of
20 Zachary Hansen, ¶24, lines 1-4.)

21 **Grounds for Objection:**

22 Objection. Irrelevant. Improper character evidence. Lacks foundation. Lacks
23 authenticity. No testimony from any person responsible for creating the internet-based
24 document attesting to how the material was prepared or its accuracy. No personal knowledge of
25 the declarant of who maintains the website, who authored the documents or accuracy of the
26 contents. (FRE §§ 401-404, 901; *United States v Tank* (9th Cir. 2000) 200 F.3d 627, 630-631;
27 *Wady v Provident Life & Accidents Ins. Co. of America* (CD CA 2002) 216 F.Supp.2d 1060,
28 1064-1065.)

1 | Page

OBJECTION NO. 41

Material Objected to:

“Exhibit “23”.” (Declaration of Zachary Hansen, ¶24, lines 1-4.)

Grounds for Objection:

Objection. Irrelevant. Improper character evidence. Lacks foundation. Lacks authenticity. No testimony from any person responsible for creating the internet-based document attesting to how the material was prepared or its accuracy. No personal knowledge of the declarant of who maintains the website, who authored the documents or accuracy of the contents. (FRE §§ 401-404, 901; *United States v Tank* (9th Cir. 2000) 200 F.3d 627, 630-631; *Wady v Provident Life & Accidents Ins. Co. of America* (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)

13 |||

OBJECTION NO. 42

Material Objected to:

“Attached hereto as **Exhibit “24”** is a true and correct copy of a screenshot I obtained of Defendant’s posts on his publicly available Telegram account dated July 6, 2023, and which was produced in discovery by Plaintiff and bates labeled as RHB00162.” (Declaration of Zachary Hansen, ¶25, lines 5-8.)

Grounds for Objection:

Objection. Irrelevant. Improper character evidence. Lacks foundation. Lacks authenticity. No testimony from any person responsible for creating the internet-based document attesting to how the material was prepared or its accuracy. No personal knowledge of the declarant of who maintains the website, who authored the documents or accuracy of the contents. (FRE §§ 401-404, 901; *United States v Tank* (9th Cir. 2000) 200 F.3d 627, 630-631; *Wady v Provident Life & Accidents Ins. Co. of America* (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)

28 | Page

OBJECTION NO. 43

Material Objected to:

“Exhibit “24”.” (Declaration of Zachary Hansen, ¶25, lines 5-8.)

Grounds for Objection:

Objection. Irrelevant. Improper character evidence. Lacks foundation. Lacks authenticity. No testimony from any person responsible for creating the internet-based document attesting to how the material was prepared or its accuracy. No personal knowledge of the declarant of who maintains the website, who authored the documents or accuracy of the contents. (FRE §§ 401-404, 901; *United States v Tank* (9th Cir. 2000) 200 F.3d 627, 630-631; *Wady v Provident Life & Accidents Ins. Co. of America* (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)

OBJECTION NO. 44

Material Objected to:

“Attached hereto as **Exhibit “25”** is a true and correct copy of a screenshot I obtained of Defendant’s posts on his publicly available Telegram account dated July 22, 2023, and which was produced in discovery by Plaintiff and bates labeled as RHB00167.” (Declaration of Zachary Hansen, ¶26, lines 9-12.)

Grounds for Objection:

Objection. Irrelevant. Improper character evidence. Lacks foundation. Lacks authenticity. No testimony from any person responsible for creating the internet-based document attesting to how the material was prepared or its accuracy. No personal knowledge of the declarant of who maintains the website, who authored the documents or accuracy of the contents. (FRE §§ 401-404, 901; *United States v Tank* (9th Cir. 2000) 200 F.3d 627, 630-631; *Wady v Provident Life & Accidents Ins. Co. of America* (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)

111

111

OBJECTION NO. 45

Material Objected to:

“Exhibit “25”.” (Declaration of Zachary Hansen, ¶26, lines 9-12.)

Grounds for Objection:

Objection. Irrelevant. Improper character evidence. Lacks foundation. Lacks authenticity. No testimony from any person responsible for creating the internet-based document attesting to how the material was prepared or its accuracy. No personal knowledge of the declarant of who maintains the website, who authored the documents or accuracy of the contents. (FRE §§ 401-404, 901; *United States v Tank* (9th Cir. 2000) 200 F.3d 627, 630-631; *Wady v Provident Life & Accidents Ins. Co. of America* (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)

OBJECTION NO. 46

Material Objected to:

“Attached hereto as **Exhibit “26”** is a true and correct copy of a screenshot I obtained of Defendant’s posts on his publicly available Telegram account dated July 28, 2023, and which was produced in discovery by Plaintiff and bates labeled as RHB00168.” (Declaration of Zachary Hansen, ¶27, lines 13-16.)

Grounds for Objection:

Objection. Irrelevant. Improper character evidence. Lacks foundation. Lacks authenticity. No testimony from any person responsible for creating the internet-based document attesting to how the material was prepared or its accuracy. No personal knowledge of the declarant of who maintains the website, who authored the documents or accuracy of the contents. (FRE §§ 401-404, 901; *United States v Tank* (9th Cir. 2000) 200 F.3d 627, 630-631; *Wady v Provident Life & Accidents Ins. Co. of America* (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)

111

III

OBJECTION NO. 47

Material Objected to:

“Exhibit “26”.” (Declaration of Zachary Hansen, ¶27, lines 13-16.)

Grounds for Objection:

Objection. Irrelevant. Improper character evidence. Lacks foundation. Lacks authenticity. No testimony from any person responsible for creating the internet-based document attesting to how the material was prepared or its accuracy. No personal knowledge of the declarant of who maintains the website, who authored the documents or accuracy of the contents. (FRE §§ 401-404, 901; *United States v Tank* (9th Cir. 2000) 200 F.3d 627, 630-631; *Wady v Provident Life & Accidents Ins. Co. of America* (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)

OBJECTION NO. 48

Material Objected to:

“Attached hereto as **Exhibit “27”** is a true and correct copy of a screenshot I obtained of a publicly available video file of the July 21, 2023 episode of *The Alex Jones Show* from <https://rumble.com/v3236py-white-house-witness-patrick-byrne-friday-full-show-072123.html>, and which was produced in discovery by Plaintiff and bates labeled as RHB00185.”
(Declaration of Zachary Hansen, ¶28, lines 17-21.)

Grounds for Objection:

Objection. Irrelevant. Improper character evidence. Lacks foundation. Lacks authenticity. No testimony from any person responsible for creating the internet-based document attesting to how the material was prepared or its accuracy. No personal knowledge of the declarant of who maintains the website, who authored the documents or accuracy of the contents. (FRE §§ 401-404, 901; *United States v Tank* (9th Cir. 2000) 200 F.3d 627, 630-631; *Wady v Provident Life & Accidents Ins. Co. of America* (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)

OBJECTION NO. 49

Material Objected to:

“Exhibit “27”.” (Declaration of Zachary Hansen, ¶28, lines 17-21.)

Grounds for Objection:

Objection. Irrelevant. Improper character evidence. Lacks foundation. Lacks authenticity. No testimony from any person responsible for creating the internet-based document attesting to how the material was prepared or its accuracy. No personal knowledge of the declarant of who maintains the website, who authored the documents or accuracy of the contents. (FRE §§ 401-404, 901; *United States v Tank* (9th Cir. 2000) 200 F.3d 627, 630-631; *Wady v Provident Life & Accidents Ins. Co. of America* (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)

OBJECTION NO. 50

Material Objected to:

“Attached hereto as **Exhibit “28”** are true and correct copies of relevant portions of a transcript of the publicly available July 21, 2023 episode of *The Alex Jones Show*, which was prepared at my direction by Plaintiff’s counsel’s office, and which was produced in discovery by Plaintiff and bates labeled as RHB00722, RHB00743-RHB00749, RHB00756, RHB00765-RHB00767, RHB00770. I have reviewed the transcript and listened to the foregoing episode and confirm that the transcript is accurate.” (Declaration of Zachary Hansen, ¶29, lines 22-28.)

Grounds for Objection:

Objection. Irrelevant. Improper character evidence. Lacks foundation. Lacks authenticity. No testimony from any person responsible for creating the internet-based document attesting to how the material was prepared or its accuracy. No personal knowledge of the declarant of who maintains the website, who authored the documents or accuracy of the contents. No admissible testimony or evidence of transcriber as to the accuracy or correctness of the transcription, despite obvious spelling errors, and gaps in the transcription. (FRE§§ 401-404, 901; 901(a)-(b) and 104(b); *United States v Tank* (9th Cir. 2000) 200 F.3d 627, 630-631;

1 *Wady v Provident Life & Accidents Ins. Co. of America* (CD CA 2002) 216 F.Supp.2d 1060,
2 1064-1065; See *Snyder v CitiSteel USA Inc.* (D. Del. 2007) 508 F.Supp.2d 407, 412-413.)
3
4

OBJECTION NO. 51

Material Objected to:

6 “Exhibit “28”.” (Declaration of Zachary Hansen, ¶29, lines 22-28.)

Grounds for Objection:

8 Objection. Irrelevant. Improper character evidence. Lacks foundation. Lacks
9 authenticity. No testimony from any person responsible for creating the internet-based
10 document attesting to how the material was prepared or its accuracy. No personal knowledge of
11 the declarant of who maintains the website, who authored the documents or accuracy of the
12 contents. No admissible testimony or evidence of transcriber as to the accuracy or correctness
13 of the transcription, despite obvious spelling errors, and gaps in the transcription. (FRE §§ 401-
14 404, 901; 901(a)-(b) and 104(b); *United States v Tank* (9th Cir. 2000) 200 F.3d 627, 630-631;
15 *Wady v Provident Life & Accidents Ins. Co. of America* (CD CA 2002) 216 F.Supp.2d 1060,
16 1064-1065; See *Snyder v CitiSteel USA Inc.* (D. Del. 2007) 508 F.Supp.2d 407, 412-413.)
17
18

OBJECTION NO. 52

Material Objected to:

20 “Attached hereto as Exhibit “29” is a true and correct copy of a screenshot I obtained
21 of Defendant’s post on his publicly available Telegram account dated July 21, 2023, and which
22 was produced in discovery by Plaintiff and bates labeled as RHB00164.” (Declaration of
23 Zachary Hansen, ¶30, lines 1-4.)

Grounds for Objection:

25 Objection. Irrelevant. Improper character evidence. Lacks foundation. Lacks
26 authenticity. No testimony from any person responsible for creating the internet-based
27 document attesting to how the material was prepared or its accuracy. No personal knowledge of
28 the declarant of who maintains the website, who authored the documents or accuracy of the
27

1 contents. (FRE§§ 401-404, 901; *United States v Tank* (9th Cir. 2000) 200 F.3d 627, 630-631;
2 *Wady v Provident Life & Accidents Ins. Co. of America* (CD CA 2002) 216 F.Supp.2d 1060,
3 1064-1065.)
4

5 **OBJECTION NO. 53**

6 **Material Objected to:**

7 “Exhibit “29”.” (Declaration of Zachary Hansen, ¶30, lines 1-4.)

8 **Grounds for Objection:**

9 Objection. Irrelevant. Improper character evidence. Lacks foundation. Lacks
10 authenticity. No testimony from any person responsible for creating the internet-based
11 document attesting to how the material was prepared or its accuracy. No personal knowledge of
12 the declarant of who maintains the website, who authored the documents or accuracy of the
13 contents. (FRE§§ 401-404, 901; *United States v Tank* (9th Cir. 2000) 200 F.3d 627, 630-631;
14 *Wady v Provident Life & Accidents Ins. Co. of America* (CD CA 2002) 216 F.Supp.2d 1060,
15 1064-1065.)
16

17 **OBJECTION NO. 54**

18 **Material Objected to:**

19 “Attached hereto as Exhibit “30” is a true and correct copy of a screenshot I obtained
20 of a publicly available video file of the September 8, 2023 episode of *The Courtenay Turner*
21 *Podcast* titled “Episode 305: Behind the Testimony of ‘America’s #1 Domestic Extremist w/
22 Patrick Byrne” from [https://courtenayturner.com/ep-305-behind-the-testimony-of-americas-1-](https://courtenayturner.com/ep-305-behind-the-testimony-of-americas-1-domestic-extremist-w-patrick-byrne/)
23 [domestic-extremist-w-patrick-byrne/](#), and which was produced in discovery by Plaintiff and
24 bates labeled as RHB00184.” (Declaration of Zachary Hansen, ¶31, lines 5-11.)

25 **Grounds for Objection:**

26 Objection. Irrelevant. Improper character evidence. Lacks foundation. Lacks
27 authenticity. No testimony from any person responsible for creating the internet-based
28 document attesting to how the material was prepared or its accuracy. No personal knowledge of
28

1 the declarant of who maintains the website, who authored the documents or accuracy of the
2 contents. (FRE §§ 401-404, 901; *United States v Tank* (9th Cir. 2000) 200 F.3d 627, 630-631;
3 *Wady v Provident Life & Accidents Ins. Co. of America* (CD CA 2002) 216 F.Supp.2d 1060,
4 1064-1065.)
5

6 **OBJECTION NO. 55**

7 **Material Objected to:**

8 "Exhibit "30"." (Declaration of Zachary Hansen, ¶31, lines 5-11.)

9 **Grounds for Objection:**

10 Objection. Irrelevant. Improper character evidence. Lacks foundation. Lacks
11 authenticity. No testimony from any person responsible for creating the internet-based
12 document attesting to how the material was prepared or its accuracy. No personal knowledge of
13 the declarant of who maintains the website, who authored the documents or accuracy of the
14 contents. (FRE §§ 401-404, 901; *United States v Tank* (9th Cir. 2000) 200 F.3d 627, 630-631;
15 *Wady v Provident Life & Accidents Ins. Co. of America* (CD CA 2002) 216 F.Supp.2d 1060,
16 1064-1065.)
17

18 **OBJECTION NO. 56**

19 **Material Objected to:**

20 "Attached hereto as Exhibit "31" are true and correct copies of relevant portions of a
21 transcript of the publicly available September 8, 2023 episode of *The Courtenay Turner*
22 *Podcast* titled "Episode 305: Behind the Testimony of 'America's #1 Domestic Extremist w/
23 Patrick Byrne", which was prepared at my direction by Plaintiff's counsel's office, and which
24 was produced in discovery by Plaintiff and bates labeled as RHB00790-RHB00793,
25 RHB00804-RHB00809, RHB00814, RHB00817-RHB00818, RHB00846. I have reviewed the
26 transcript and listened to the foregoing episode and confirm that the transcript is accurate."
27 (Declaration of Zachary Hansen, ¶32, lines 12-19.)

28 **Grounds for Objection:**

1 Objection. Irrelevant. Improper character evidence. Lacks foundation. Lacks
2 authenticity. No testimony from any person responsible for creating the internet-based
3 document attesting to how the material was prepared or its accuracy. No personal knowledge of
4 the declarant of who maintains the website, who authored the documents or accuracy of the
5 contents. No admissible testimony or evidence of transcriber as to the accuracy or correctness
6 of the transcription, despite obvious spelling errors, and gaps in the transcription. (FRE §§ 401-
7 404, 901; 901(a)-(b) and 104(b); *United States v Tank* (9th Cir. 2000) 200 F.3d 627, 630-631;
8 *Wady v Provident Life & Accidents Ins. Co. of America* (CD CA 2002) 216 F.Supp.2d 1060,
9 1064-1065; See *Snyder v CitiSteel USA Inc.* (D. Del. 2007) 508 F.Supp.2d 407, 412-413.)

10

11 **OBJECTION NO. 57**

12 **Material Objected to:**

13 "Exhibit "31"." (Declaration of Zachary Hansen, ¶32, lines 12-19.)

14 **Grounds for Objection:**

15 Objection. Irrelevant. Improper character evidence. Lacks foundation. Lacks
16 authenticity. No testimony from any person responsible for creating the internet-based
17 document attesting to how the material was prepared or its accuracy. No personal knowledge of
18 the declarant of who maintains the website, who authored the documents or accuracy of the
19 contents. No admissible testimony or evidence of transcriber as to the accuracy or correctness
20 of the transcription, despite obvious spelling errors, and gaps in the transcription. (FRE §§ 401-
21 404, 901; 901(a)-(b) and 104(b); *United States v Tank* (9th Cir. 2000) 200 F.3d 627, 630-631;
22 *Wady v Provident Life & Accidents Ins. Co. of America* (CD CA 2002) 216 F.Supp.2d 1060,
23 1064-1065; See *Snyder v CitiSteel USA Inc.* (D. Del. 2007) 508 F.Supp.2d 407, 412-413.)

24

25 **OBJECTION NO. 58**

26 **Material Objected to:**

27 "Attached hereto as Exhibit "32" is a true and correct copy of a screenshot I obtained
28 of Defendant's post on his publicly available Telegram account dated September 17, 2023, and

1 which was produced in discovery by Plaintiff and bates labeled as RHB00169.” (Declaration of
2 Zachary Hansen, ¶33, lines 20-23.)

3 **Grounds for Objection:**

4 Objection. Irrelevant. Improper character evidence. Lacks foundation. Lacks
5 authenticity. No testimony from any person responsible for creating the internet-based
6 document attesting to how the material was prepared or its accuracy. No personal knowledge of
7 the declarant of who maintains the website, who authored the documents or accuracy of the
8 contents. (FRE §§ 401-404, 901; *United States v Tank* (9th Cir. 2000) 200 F.3d 627, 630-631;
9 *Wady v Provident Life & Accidents Ins. Co. of America* (CD CA 2002) 216 F.Supp.2d 1060,
10 1064-1065.)

11
12 **OBJECTION NO. 59**

13 **Material Objected to:**

14 “Exhibit “32.” (Declaration of Zachary Hansen, ¶33, lines 20-23.)

15 **Grounds for Objection:**

16 Objection. Irrelevant. Improper character evidence. Lacks foundation. Lacks
17 authenticity. No testimony from any person responsible for creating the internet-based
18 document attesting to how the material was prepared or its accuracy. No personal knowledge of
19 the declarant of who maintains the website, who authored the documents or accuracy of the
20 contents. (FRE §§ 401-404, 901; *United States v Tank* (9th Cir. 2000) 200 F.3d 627, 630-631;
21 *Wady v Provident Life & Accidents Ins. Co. of America* (CD CA 2002) 216 F.Supp.2d 1060,
22 1064-1065.)

23
24 **OBJECTION NO. 60**

25 **Material Objected to:**

26 “Attached hereto as **Exhibit “33”** is a true and correct copy of a screenshot I obtained
27 of Defendant’s post on his publicly available X (formerly known as Twitter) account dated
28 October 8, 2023, and which was produced in discovery by Plaintiff and bates labeled as

1 RHB00147.” (Declaration of Zachary Hansen, ¶34, lines 24-27.)

2 **Grounds for Objection:**

3 Objection. Irrelevant. Improper character evidence. Lacks foundation. Lacks
4 authenticity. No testimony from any person responsible for creating the internet-based
5 document attesting to how the material was prepared or its accuracy. No personal knowledge of
6 the declarant of who maintains the website, who authored the documents or accuracy of the
7 contents. (FRE §§ 401-404, 901; *United States v Tank* (9th Cir. 2000) 200 F.3d 627, 630-631;
8 *Wady v Provident Life & Accidents Ins. Co. of America* (CD CA 2002) 216 F.Supp.2d 1060,
9 1064-1065.)

10
11 **OBJECTION NO. 61**

12 **Material Objected to:**

13 “Exhibit “33”.” (Declaration of Zachary Hansen, ¶34, lines 24-27.)

14 **Grounds for Objection:**

15 Objection. Irrelevant. Improper character evidence. Lacks foundation. Lacks
16 authenticity. No testimony from any person responsible for creating the internet-based
17 document attesting to how the material was prepared or its accuracy. No personal knowledge of
18 the declarant of who maintains the website, who authored the documents or accuracy of the
19 contents. (FRE §§ 401-404, 901; *United States v Tank* (9th Cir. 2000) 200 F.3d 627, 630-631;
20 *Wady v Provident Life & Accidents Ins. Co. of America* (CD CA 2002) 216 F.Supp.2d 1060,
21 1064-1065.)

22
23 **OBJECTION NO. 62**

24 **Material Objected to:**

25 “Attached hereto as Exhibit “34” is a true and correct copy of a screenshot I obtained
26 of Defendant’s post on his publicly available X (formerly known as Twitter) account dated
27 October 8, 2023, and which was produced in discovery by Plaintiff and bates labeled as
28 RHB00146.” (Declaration of Zachary Hansen, ¶35, lines 1-4.)

32

EVIDENTIARY OBJECTIONS TO PLAINTIFF’S DECLARATION AND EXHIBITS FILED IN SUPPORT OF
PLAINTIFF’S OPPOSITION TO DEFENDANT’S MOTION FOR SUMMARY JUDGMENT

Case No. 2:23-cv-09430-SVW-PD

1 **Grounds for Objection:**

2 Objection. Irrelevant. Improper character evidence. Lacks foundation. Lacks
3 authenticity. No testimony from any person responsible for creating the internet-based
4 document attesting to how the material was prepared or its accuracy. No personal knowledge of
5 the declarant of who maintains the website, who authored the documents or accuracy of the
6 contents. (FRE §§ 401-404, 901; *United States v Tank* (9th Cir. 2000) 200 F.3d 627, 630-631;
7 *Wady v Provident Life & Accidents Ins. Co. of America* (CD CA 2002) 216 F.Supp.2d 1060,
8 1064-1065.)

9

10 **OBJECTION NO. 63**

11 **Material Objected to:**

12 “Exhibit “34”.” (Declaration of Zachary Hansen, ¶35, lines 1-4.)

13 **Grounds for Objection:**

14 Objection. Irrelevant. Improper character evidence. Hearsay. Lacks foundation.
15 Lacks authenticity. No testimony from any person responsible for creating the internet-based
16 document attesting to how the material was prepared or its accuracy. No personal knowledge of
17 the declarant of who maintains the website, who authored the documents or accuracy of the
18 contents. (FRE §§ 401-404, 801, 901; *United States v Tank* (9th Cir. 2000) 200 F.3d 627, 630-
19 631; *Wady v Provident Life & Accidents Ins. Co. of America* (CD CA 2002) 216 F.Supp.2d
20 1060, 1064-1065.)

21

22 **OBJECTION NO. 64**

23 **Material Objected to:**

24 “Attached hereto as Exhibit “35” is a true and correct copy of a screenshot I obtained
25 of Defendant’s post on his publicly available X (formerly known as Twitter) account dated
26 October 17, 2023, including associated comments and which was produced in discovery by
27 Plaintiff and bates labeled as RHB00141.” (Declaration of Zachary Hansen, ¶36, lines 5-8.)

28 **Grounds for Objection:**

33

EVIDENTIARY OBJECTIONS TO PLAINTIFF’S DECLARATION AND EXHIBITS FILED IN SUPPORT OF
PLAINTIFF’S OPPOSITION TO DEFENDANT’S MOTION FOR SUMMARY JUDGMENT

Case No. 2:23-cv-09430-SVW-PD

1 Objection. Irrelevant. Improper character evidence. Hearsay. Lacks foundation.
2 Lacks authenticity. No testimony from any person responsible for creating the internet-based
3 document attesting to how the material was prepared or its accuracy. No personal knowledge of
4 the declarant of who maintains the website, who authored the documents or accuracy of the
5 contents. (FRE §§ 401-404, 801, 901; *United States v Tank* (9th Cir. 2000) 200 F.3d 627, 630-
6 631; *Wady v Provident Life & Accidents Ins. Co. of America* (CD CA 2002) 216 F.Supp.2d
7 1060, 1064-1065.)

8 **OBJECTION NO. 65**

9 **Material Objected to:**

10 “Exhibit “35.” (Declaration of Zachary Hansen, ¶36, lines 5-8.)

11 **Grounds for Objection:**

12 Objection. Irrelevant. Improper character evidence. Lacks foundation. Lacks
13 authenticity. No testimony from any person responsible for creating the internet-based
14 document attesting to how the material was prepared or its accuracy. No personal knowledge of
15 the declarant of who maintains the website, who authored the documents or accuracy of the
16 contents. (FRE §§ 401-404, 901; *United States v Tank* (9th Cir. 2000) 200 F.3d 627, 630-631;
17 *Wady v Provident Life & Accidents Ins. Co. of America* (CD CA 2002) 216 F.Supp.2d 1060,
18 1064-1065.)

19 **OBJECTION NO. 66**

20 **Material Objected to:**

21 “Attached hereto as Exhibit “36” is a true and correct copy of a screenshot I obtained
22 of Defendant’s post on his publicly available X (formerly known as Twitter) account dated
23 October 17, 2023, and which was produced in discovery by Plaintiff and bates labeled as
24 RHB00148.” (Declaration of Zachary Hansen, ¶37, lines 9-12.)

25 **Grounds for Objection:**

26 Objection. Irrelevant. Improper character evidence. Hearsay. Lacks foundation.
27 Lacks authenticity. No testimony from any person responsible for creating the internet-based
28 document attesting to how the material was prepared or its accuracy. No personal knowledge of
34

1 the declarant of who maintains the website, who authored the documents or accuracy of the
2 contents. (FRE§§ 401-404, 801, 901; *United States v Tank* (9th Cir. 2000) 200 F.3d 627, 630-
3 631; *Wady v Provident Life & Accidents Ins. Co. of America* (CD CA 2002) 216 F.Supp.2d
4 1060, 1064-1065.)

5 **OBJECTION NO. 67**

6 **Material Objected to:**

7 "Exhibit "36". (Declaration of Zachary Hansen, ¶37, lines 9-12.)

8 **Grounds for Objection:**

9 Objection. Irrelevant. Improper character evidence. Hearsay. Lacks foundation.
10 Lacks authenticity. No testimony from any person responsible for creating the internet-based
11 document attesting to how the material was prepared or its accuracy. No personal knowledge of
12 the declarant of who maintains the website, who authored the documents or accuracy of the
13 contents. (FRE§§ 401-404, 801, 901; *United States v Tank* (9th Cir. 2000) 200 F.3d 627, 630-
14 631; *Wady v Provident Life & Accidents Ins. Co. of America* (CD CA 2002) 216 F.Supp.2d
15 1060, 1064-1065.)

16 **OBJECTION NO. 68**

17 **Material Objected to:**

18 "Attached hereto as Exhibit "37" are true and correct copies of multiple screenshots I
19 obtained of Defendant's post on his publicly available X (formerly known as Twitter) account
20 dated November 9, 2023, including associated comments and which were produced in
21 discovery by Plaintiff and bates labeled as RHB00120, RHB00123-RHB00124." (Declaration
22 of Zachary Hansen, ¶38, lines 13-17.)

23 **Grounds for Objection:**

24 Objection. Irrelevant. Improper character evidence. Hearsay. Lacks foundation.
25 Lacks authenticity. No testimony from any person responsible for creating the internet-based
26 document attesting to how the material was prepared or its accuracy. No personal knowledge of
27 the declarant of who maintains the website, who authored the documents or accuracy of the
28 contents. (FRE§§ 401-404, 801, 901; *United States v Tank* (9th Cir. 2000) 200 F.3d 627, 630-
35

**EVIDENTIARY OBJECTIONS TO PLAINTIFF'S DECLARATION AND EXHIBITS FILED IN SUPPORT OF
PLAINTIFF'S OPPOSITION TO DEFENDANT'S MOTION FOR SUMMARY JUDGMENT**

Case No. 2:23-cv-09430-SVW-PD

1 631; *Wady v Provident Life & Accidents Ins. Co. of America* (CD CA 2002) 216 F.Supp.2d
2 1060, 1064-1065.)

3 **OBJECTION NO. 69**

4 **Material Objected to:**

5 "Exhibit "37"." (Declaration of Zachary Hansen, ¶38, lines 13-17.)

6 **Grounds for Objection:**

7 Objection. Irrelevant. Improper character evidence. Hearsay. Lacks foundation.
8 Lacks authenticity. No testimony from any person responsible for creating the internet-based
9 document attesting to how the material was prepared or its accuracy. No personal knowledge of
10 the declarant of who maintains the website, who authored the documents or accuracy of the
11 contents. (FRE §§ 401-404, 801, 901; *United States v Tank* (9th Cir. 2000) 200 F.3d 627, 630-
12 631; *Wady v Provident Life & Accidents Ins. Co. of America* (CD CA 2002) 216 F.Supp.2d
13 1060, 1064-1065.)

14 **OBJECTION NO. 70**

15 **Material Objected to:**

16 "Attached hereto as Exhibit "38" is a true and correct copy of a screenshot I obtained
17 of a publicly available video file of the November 13, 2023 episode of *The StoneZONE with*
18 *Roger Stone* with the caption "Sued by Hunter Biden Former Overstock CEO Patrick Byrne
19 Enters the StoneZone" from [https://rumble.com/v3viewv-sued-by-hunter-biden-former-](https://rumble.com/v3viewv-sued-by-hunter-biden-former-overstock-ceo-patrick-byrne-joins-roger-stone-i.html)
20 [overstock-ceo-patrick-byrne-joins-roger-stone-i.html](https://rumble.com/v3viewv-sued-by-hunter-biden-former-overstock-ceo-patrick-byrne-joins-roger-stone-i.html), and which was produced in discovery by
21 Plaintiff and bates labeled as RHB00183." (Declaration of Zachary Hansen, ¶39, lines 18-24.)

22 **Grounds for Objection:**

23 Objection. Irrelevant. Improper character evidence. Lacks foundation. Lacks
24 authenticity. No testimony from any person responsible for creating the internet-based
25 document attesting to how the material was prepared or its accuracy. No personal knowledge of
26 the declarant of who maintains the website, who authored the documents or accuracy of the
27 contents. (FRE §§ 401-404, 901; 901(a)-(b) and 104(b); *United States v Tank* (9th Cir. 2000)
28 200 F.3d 627, 630-631; *Wady v Provident Life & Accidents Ins. Co. of America* (CD CA 2002)
36

1 216 F.Supp.2d 1060, 1064-1065.)

2 **OBJECTION NO. 71**

3 **Material Objected to:**

4 “Exhibit “38”.” (Declaration of Zachary Hansen, ¶39, lines 18-24.)

5 **Grounds for Objection:**

6 Objection. Irrelevant. Improper character evidence. Lacks foundation. Lacks
7 authenticity. No testimony from any person responsible for creating the internet-based
8 document attesting to how the material was prepared or its accuracy. No personal knowledge of
9 the declarant of who maintains the website, who authored the documents or accuracy of the
10 contents. (FRE §§ 401-404, 901; 901(a)-(b) and 104(b); *United States v Tank* (9th Cir. 2000)
11 200 F.3d 627, 630-631; *Wady v Provident Life & Accidents Ins. Co. of America* (CD CA 2002)
12 216 F.Supp.2d 1060, 1064-1065.)

13
14 **OBJECTION NO. 72**

15 **Material Objected to:**

16 “Attached hereto as Exhibit “39” are true and correct copies of relevant portions of a
17 transcript of the publicly available November 13, 2023 episode of *The StoneZONE with Roger*
18 *Stone*, which was prepared at my direction by Plaintiff’s counsel’s office, and which was
19 produced in discovery by Plaintiff and bates labeled as RHB00847-RHB00864. I have
20 reviewed the transcript and listened to the foregoing episode and confirm that the transcript is
21 accurate.” (Declaration of Zachary Hansen, ¶40, lines 1-6.)

22 **Grounds for Objection:**

23 Objection. Irrelevant. Improper character evidence. Lacks foundation. Lacks
24 authenticity. No testimony from any person responsible for creating the internet-based
25 document attesting to how the material was prepared or its accuracy. No personal knowledge of
26 the declarant of who maintains the website, who authored the documents or accuracy of the
27 contents. No admissible testimony or evidence of transcriber as to the accuracy or correctness
28 of the transcription, despite obvious spelling errors, and gaps in the transcription. (FRE §§ 401-
37

1 404, 901; 901(a)-(b) and 104(b); *United States v Tank* (9th Cir. 2000) 200 F.3d 627, 630-631;
2 *Wady v Provident Life & Accidents Ins. Co. of America* (CD CA 2002) 216 F.Supp.2d 1060,
3 1064-1065; See *Snyder v CitiSteel USA Inc.* (D. Del. 2007) 508 F.Supp.2d 407, 412-413.)

4 **OBJECTION NO. 73**

5 **Material Objected to:**

6 “**Exhibit “39”.**” (Declaration of Zachary Hansen, ¶40, lines 1-6.)

7 **Grounds for Objection:**

8 Objection. Irrelevant. Improper character evidence. Lacks foundation. Lacks
9 authenticity. No testimony from any person responsible for creating the internet-based
10 document attesting to how the material was prepared or its accuracy. No personal knowledge of
11 the declarant of who maintains the website, who authored the documents or accuracy of the
12 contents. No admissible testimony or evidence of transcriber as to the accuracy or correctness
13 of the transcription, despite obvious spelling errors, and gaps in the transcription. (FRE §§ 401-
14 404, 901; 901(a)-(b) and 104(b); *United States v Tank* (9th Cir. 2000) 200 F.3d 627, 630-631;
15 *Wady v Provident Life & Accidents Ins. Co. of America* (CD CA 2002) 216 F.Supp.2d 1060,
16 1064-1065; See *Snyder v CitiSteel USA Inc.* (D. Del. 2007) 508 F.Supp.2d 407, 412-413.)

17
18 **OBJECTION NO. 74**

19 **Material Objected to:**

20 “Attached hereto as **Exhibit “40”** are true and correct copies of multiple screenshots I
21 obtained of Defendant’s post on his publicly available X (formerly known as Twitter) account
22 dated November 13, 2023, including associated comments and which were produced in
23 discovery by Plaintiff and bates labeled as RHB00108, RHB00131-RHB00132.” (Declaration
24 of Zachary Hansen, ¶41, lines 7-11.)

25 **Grounds for Objection:**

26 Objection. Irrelevant. Improper character evidence. Hearsay. Lacks foundation.
27 Lacks authenticity. No testimony from any person responsible for creating the internet-based
28 document attesting to how the material was prepared or its accuracy. No personal knowledge of
38

1 the declarant of who maintains the website, who authored the documents or accuracy of the
2 contents. (FRE §§ 401-404, 801, 901; *United States v Tank* (9th Cir. 2000) 200 F.3d 627, 630-
3 631; *Wady v Provident Life & Accidents Ins. Co. of America* (CD CA 2002) 216 F.Supp.2d
4 1060, 1064-1065; See *Snyder v CitiSteel USA Inc.* (D. Del. 2007) 508 F.Supp.2d 407, 412-
5 413.)

6 **OBJECTION NO. 75**

7 **Material Objected to:**

8 "Exhibit "40"." (Declaration of Zachary Hansen, ¶41, lines 7-11.)

9 **Grounds for Objection:**

10 Objection. Irrelevant. Improper character evidence. Lacks foundation. Lacks
11 authenticity. No testimony from any person responsible for creating the internet-based
12 document attesting to how the material was prepared or its accuracy. No personal knowledge of
13 the declarant of who maintains the website, who authored the documents or accuracy of the
14 contents.. (FRE §§ 401-404, 901; *United States v Tank* (9th Cir. 2000) 200 F.3d 627, 630-631;
15 *Wady v Provident Life & Accidents Ins. Co. of America* (CD CA 2002) 216 F.Supp.2d 1060,
16 1064-1065; See *Snyder v CitiSteel USA Inc.* (D. Del. 2007) 508 F.Supp.2d 407, 412-413.)

17
18 **OBJECTION NO. 76**

19 **Material Objected to:**

20 "Attached hereto as Exhibit "41" is a true and correct copy of a screenshot I obtained
21 from Amazon.com of Defendant's book "*Danger Close: Domestic Extremist #1 Comes Clean*"
22 for sale and which was produced in discovery by Plaintiff and bates labeled as RHB00709. I
23 purchased Defendant's book "*Danger Close: Domestic Extremist #1 Comes Clean*" from
24 Amazon.com and can confirm based on my personal review of this book, that the same
25 defamatory statements that Defendant published in the June 27, 2023 Capitol Times Magazine
26 article about Plaintiff, and which form the basis of this lawsuit, are also contained in
27 Defendant's book "*Danger Close: Domestic Extremist #1 Comes Clean*". (Declaration of
28 Zachary Hansen, ¶42, lines 12-20.)

1 **Grounds for Objection:**

2 Objection. Irrelevant. Improper character evidence. Best Evidence Rule.

3 Hearsay. Lacks foundation. Lacks authenticity. No testimony from any person responsible for
4 creating the internet-based document attesting to how the material was prepared or its accuracy.
5 No personal knowledge of the declarant of who maintains the website, who authored the
6 documents or accuracy of the contents. (FRE §§ 401-404, 801, 901; 1002; *United States v Tank*
7 (9th Cir. 2000) 200 F.3d 627, 630-631; *Wady v Provident Life & Accidents Ins. Co. of America*
8 (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)

9 **OBJECTION NO. 77**

10 **Material Objected to:**

11 “Exhibit “41”.” (Declaration of Zachary Hansen, ¶42, lines 12-20.)

12 **Grounds for Objection:**

13 Objection. Irrelevant. Improper character evidence. Best Evidence Rule. Lacks
14 foundation. Lacks authenticity. No testimony from any person responsible for creating the
15 internet-based document attesting to how the material was prepared or its accuracy. No
16 personal knowledge of the declarant of who maintains the website, who authored the
17 documents or accuracy of the contents. (FRE §§ 401-404, 901, 1002; *United States v Tank* (9th
18 Cir. 2000) 200 F.3d 627, 630-631; *Wady v Provident Life & Accidents Ins. Co. of America* (CD
19 CA 2002) 216 F.Supp.2d 1060, 1064-1065.)

20
21 **OBJECTION NO. 78**

22 **Material Objected to:**

23 “Attached hereto as **Exhibit “42”** is a true and correct copy of a screenshot I obtained
24 of Defendant’s post on his publicly available X (formerly known as Twitter) account dated
25 April 25, 2024, and which was produced in discovery by Plaintiff and bates labeled as
26 RHB00107.” (Declaration of Zachary Hansen, ¶43, lines 21-24.)

27 **Grounds for Objection:**

28 Objection. Irrelevant. Improper character evidence. Lacks foundation. Lacks

1 authenticity. No testimony from any person responsible for creating the internet-based
2 document attesting to how the material was prepared or its accuracy. No personal knowledge of
3 the declarant of who maintains the website, who authored the documents or accuracy of the
4 contents. (FRE §§ 401-404, 901; *United States v Tank* (9th Cir. 2000) 200 F.3d 627, 630-631;
5 *Wady v Provident Life & Accidents Ins. Co. of America* (CD CA 2002) 216 F.Supp.2d 1060,
6 1064-1065.)

7 **OBJECTION NO. 79**

8 **Material Objected to:**

9 “Exhibit “42”.” (Declaration of Zachary Hansen, ¶43, lines 21-24.)

10 **Grounds for Objection:**

11 Objection. Irrelevant. Improper character evidence. Lacks foundation. Lacks
12 authenticity. No testimony from any person responsible for creating the internet-based
13 document attesting to how the material was prepared or its accuracy. No personal knowledge of
14 the declarant of who maintains the website, who authored the documents or accuracy of the
15 contents. (FRE §§ 401-404, 901; *United States v Tank* (9th Cir. 2000) 200 F.3d 627, 630-631;
16 *Wady v Provident Life & Accidents Ins. Co. of America* (CD CA 2002) 216 F.Supp.2d 1060,
17 1064-1065.)

18
19 **OBJECTION NO. 80**

20 **Material Objected to:**

21 “Attached hereto as Exhibit “43” is a true and correct copy of a screenshot I obtained
22 of Defendant’s post on his publicly available Truth Social account dated February 13, 2024,
23 and which was produced in discovery by Plaintiff and bates labeled as RHB00170.”
24 (Declaration of Zachary Hansen, ¶44, lines 25-28.)

25 **Grounds for Objection:**

26 Objection. Irrelevant. Improper character evidence. Lacks foundation. Lacks
27 authenticity. No testimony from any person responsible for creating the internet-based
28 document attesting to how the material was prepared or its accuracy. No personal knowledge of
41

1 the declarant of who maintains the website, who authored the documents or accuracy of the
2 contents. (FRE§§ 401-404, 901; *United States v Tank* (9th Cir. 2000) 200 F.3d 627, 630-631;
3 *Wady v Provident Life & Accidents Ins. Co. of America* (CD CA 2002) 216 F.Supp.2d 1060,
4 1064-1065.)

5 **OBJECTION NO. 81**

6 **Material Objected to:**

7 “Exhibit “43”.” (Declaration of Zachary Hansen, ¶44, lines 25-28.)

8 **Grounds for Objection:**

9 Objection. Irrelevant. Improper character evidence. Lacks foundation. Lacks
10 authenticity. No testimony from any person responsible for creating the internet-based
11 document attesting to how the material was prepared or its accuracy. No personal knowledge of
12 the declarant of who maintains the website, who authored the documents or accuracy of the
13 contents. (FRE§§ 401-404, 901; *United States v Tank* (9th Cir. 2000) 200 F.3d 627, 630-631;
14 *Wady v Provident Life & Accidents Ins. Co. of America* (CD CA 2002) 216 F.Supp.2d 1060,
15 1064-1065.)

16
17 **OBJECTION NO. 82**

18 **Material Objected to:**

19 “Attached hereto as Exhibit “44” is a true and correct copy of a screenshot I obtained
20 of Defendant’s post on his publicly available X Truth Social account dated February 22, 2024,
21 and which was produced in discovery by Plaintiff and bates labeled as RHB00172.”

22 (Declaration of Zachary Hansen, ¶45, lines 1-4.)

23 **Grounds for Objection:**

24 Objection. Irrelevant. Improper character evidence. Lacks foundation. Lacks
25 authenticity. No testimony from any person responsible for creating the internet-based
26 document attesting to how the material was prepared or its accuracy. No personal knowledge of
27 the declarant of who maintains the website, who authored the documents or accuracy of the
28 contents. (FRE§§ 401-404, 901; *United States v Tank* (9th Cir. 2000) 200 F.3d 627, 630-631;

Wady v Provident Life & Accidents Ins. Co. of America (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)

OBJECTION NO. 83

Material Objected to:

“Exhibit “44”.” (Declaration of Zachary Hansen, ¶45, lines 1-4.)

Grounds for Objection:

Objection. Irrelevant. Improper character evidence. Lacks foundation. Lacks authenticity. No testimony from any person responsible for creating the internet-based document attesting to how the material was prepared or its accuracy. No personal knowledge of the declarant of who maintains the website, who authored the documents or accuracy of the contents. (FRE §§ 401-404, 901; 901(a)-(b) and 104(b); *United States v Tank* (9th Cir. 2000) 200 F.3d 627, 630-631; *Wady v Provident Life & Accidents Ins. Co. of America* (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)

OBJECTION NO. 84

Material Objected to:

“Attached hereto as **Exhibit “45”** is a true and correct copy of a screenshot I obtained of Defendant’s post on his publicly available Truth Social account from 2024 (exact date unknown), and which was produced in discovery by Plaintiff and bates labeled as RHB00174.” (Declaration of Zachary Hansen, ¶46, lines 5-8.)

Grounds for Objection:

Objection. Irrelevant. Improper character evidence. Lacks foundation. Lacks authenticity. No testimony from any person responsible for creating the internet-based document attesting to how the material was prepared or its accuracy. No personal knowledge of the declarant of who maintains the website, who authored the documents or accuracy of the contents. (FRE §§ 401-404, 901; *United States v Tank* (9th Cir. 2000) 200 F.3d 627, 630-631; *Wady v Provident Life & Accidents Ins. Co. of America* (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)

OBJECTION NO. 85

Material Objected to:

“Exhibit “45”.” (Declaration of Zachary Hansen, ¶46, lines 5-8.)

Grounds for Objection:

Objection. Irrelevant. Improper character evidence. Lacks foundation. Lacks authenticity. No testimony from any person responsible for creating the internet-based document attesting to how the material was prepared or its accuracy. No personal knowledge of the declarant of who maintains the website, who authored the documents or accuracy of the contents. (FRE§§ 401-404, 901; *United States v Tank* (9th Cir. 2000) 200 F.3d 627, 630-631; *Wady v Provident Life & Accidents Ins. Co. of America* (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)

OBJECTION NO. 86

Material Objected to:

“Attached hereto as **Exhibit “46”** is a true and correct copy of a screenshot I obtained of Defendant’s post on his publicly available Truth Social account from 2024 (exact date unknown), and which was produced in discovery by Plaintiff and bates labeled as RHB00176 .” (Declaration of Zachary Hansen, ¶47, lines 9-12.)

Grounds for Objection:

Objection. Irrelevant. Improper character evidence. Lacks foundation. Lacks authenticity. No testimony from any person responsible for creating the internet-based document attesting to how the material was prepared or its accuracy. No personal knowledge of the declarant of who maintains the website, who authored the documents or accuracy of the contents. (FRE §§ 401-404, 901; *United States v Tank* (9th Cir. 2000) 200 F.3d 627, 630-631; *Wady v Provident Life & Accidents Ins. Co. of America* (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)

OBJECTION NO. 87

1 **Material Objected to:**

2 "Exhibit "46"." (Declaration of Zachary Hansen, ¶47, lines 9-12.)

3 **Grounds for Objection:**

4 Objection. Irrelevant. Improper character evidence. Lacks foundation. Lacks
5 authenticity. No testimony from any person responsible for creating the internet-based
6 document attesting to how the material was prepared or its accuracy. No personal knowledge of
7 the declarant of who maintains the website, who authored the documents or accuracy of the
8 contents. (FRE §§ 401-404, 901; *United States v Tank* (9th Cir. 2000) 200 F.3d 627, 630-631;
9 *Wady v Provident Life & Accidents Ins. Co. of America* (CD CA 2002) 216 F.Supp.2d 1060,
10 1064-1065.)

11
12 **OBJECTION NO. 88**

13 **Material Objected to:**

14 "Attached hereto as Exhibit "47" is a true and correct copy of a screenshot I obtained
15 of Defendant's post on his publicly available Truth Social account from 2024 (exact date
16 unknown), and which was produced in discovery by Plaintiff and bates labeled as RHB00177."
17 (Declaration of Zachary Hansen, ¶48, lines 13-16.)

18 **Grounds for Objection:**

19 Objection. Irrelevant. Improper character evidence. Lacks foundation. Lacks
20 authenticity. No testimony from any person responsible for creating the internet-based
21 document attesting to how the material was prepared or its accuracy. No personal knowledge of
22 the declarant of who maintains the website, who authored the documents or accuracy of the
23 contents. (FRE §§ 401-404, 901; *United States v Tank* (9th Cir. 2000) 200 F.3d 627, 630-631;
24 *Wady v Provident Life & Accidents Ins. Co. of America* (CD CA 2002) 216 F.Supp.2d 1060,
25 1064-1065.)

26 **OBJECTION NO. 89**

27 **Material Objected to:**

28 "Exhibit "47"." (Declaration of Zachary Hansen, ¶48, lines 13-16.)

45

EVIDENTIARY OBJECTIONS TO PLAINTIFF'S DECLARATION AND EXHIBITS FILED IN SUPPORT OF
PLAINTIFF'S OPPOSITION TO DEFENDANT'S MOTION FOR SUMMARY JUDGMENT

Case No. 2:23-cv-09430-SVW-PD

1 **Grounds for Objection:**

2 Objection. Irrelevant. Improper character evidence. Lacks foundation. Lacks
3 authenticity. No testimony from any person responsible for creating the internet-based
4 document attesting to how the material was prepared or its accuracy. No personal knowledge of
5 the declarant of who maintains the website, who authored the documents or accuracy of the
6 contents. (FRE §§ 401-404, 901; *United States v Tank* (9th Cir. 2000) 200 F.3d 627, 630-631;
7 *Wady v Provident Life & Accidents Ins. Co. of America* (CD CA 2002) 216 F.Supp.2d 1060,
8 1064-106.)

9
10 **OBJECTION NO. 90**

11 **Material Objected to:**

12 “Attached hereto as **Exhibit “48”** is a true and correct copy of a screenshot I obtained
13 of Defendant’s post on his publicly available X (formerly known as Twitter) account dated July
14 22, 2024, including associated comments and which was produced in discovery by Plaintiff and
15 bates labeled as RHB00138.” (Declaration of Zachary Hansen, ¶49, lines 17-20.)

16 **Grounds for Objection:**

17 Objection. Irrelevant. Improper character evidence. Lacks foundation. Lacks
18 authenticity. No testimony from any person responsible for creating the internet-based
19 document attesting to how the material was prepared or its accuracy. No personal knowledge of
20 the declarant of who maintains the website, who authored the documents or accuracy of the
21 contents. (FRE §§ 401-404 *United States v Tank* (9th Cir. 2000) 200 F.3d 627, 630-631; *Wady v*
22 *Provident Life & Accidents Ins. Co. of America* (CD CA 2002) 216 F.Supp.2d 1060, 1064-
23 1065.)

24 **OBJECTION NO. 91**

25 **Material Objected to:**

26 “**Exhibit “48”.**” (Declaration of Zachary Hansen, ¶49, lines 17-20.)

27 **Grounds for Objection:**

28 Objection. Irrelevant. Improper character evidence. Lacks foundation. Lacks
46

1 authenticity. No testimony from any person responsible for creating the internet-based
2 document attesting to how the material was prepared or its accuracy. No personal knowledge of
3 the declarant of who maintains the website, who authored the documents or accuracy of the
4 contents. (FRE §§ 401-404, 901; *United States v Tank* (9th Cir. 2000) 200 F.3d 627, 630-631;
5 *Wady v Provident Life & Accidents Ins. Co. of America* (CD CA 2002) 216 F.Supp.2d 1060,
6 1064-1065.)

7

8 **OBJECTION NO. 92**

9 **Material Objected to:**

10 “Attached hereto as **Exhibit “49”** is a true and correct copy of a screenshot I obtained
11 of Defendant’s post on his publicly available Telegram account dated June 5, 2024, and which
12 was produced in discovery by Plaintiff and bates labeled as RHB00704.” (Declaration of
13 Zachary Hansen, ¶50, lines 21-24.)

14 **Grounds for Objection:**

15 Objection. Irrelevant. Improper character evidence. Lacks foundation. Lacks
16 authenticity. No testimony from any person responsible for creating the internet-based
17 document attesting to how the material was prepared or its accuracy. No personal knowledge of
18 the declarant of who maintains the website, who authored the documents or accuracy of the
19 contents. (FRE §§ 401-404, 901; *United States v Tank* (9th Cir. 2000) 200 F.3d 627, 630-631;
20 *Wady v Provident Life & Accidents Ins. Co. of America* (CD CA 2002) 216 F.Supp.2d 1060,
21 1064-1065.)

22 **OBJECTION NO. 93**

23 **Material Objected to:**

24 “**Exhibit “49”.**” (Declaration of Zachary Hansen, ¶50, lines 21-24.)

25 **Grounds for Objection:**

26 Objection. Irrelevant. Improper character evidence. Lacks foundation. Lacks
27 authenticity. No testimony from any person responsible for creating the internet-based
28 document attesting to how the material was prepared or its accuracy. No personal knowledge of
47

1 the declarant of who maintains the website, who authored the documents or accuracy of the
2 contents. (FRE§§ 401-404, 901; *United States v Tank* (9th Cir. 2000) 200 F.3d 627, 630-631;
3 *Wady v Provident Life & Accidents Ins. Co. of America* (CD CA 2002) 216 F.Supp.2d 1060,
4 1064-1065.)

5

6 **OBJECTION NO. 94**

7 **Material Objected to:**

8 “Attached hereto as **Exhibit “50”** is a true and correct copy of a screenshot I obtained
9 of Defendant’s post on his publicly available Telegram account dated October 7, 2024, and
10 which was produced in discovery by Plaintiff and bates labeled as RHB00705.” (Declaration of
11 Zachary Hansen, ¶51, lines 25-28.)

12 **Grounds for Objection:**

13 Objection. Irrelevant. Improper character evidence. Lacks foundation. Lacks
14 authenticity. No testimony from any person responsible for creating the internet-based
15 document attesting to how the material was prepared or its accuracy. No personal knowledge of
16 the declarant of who maintains the website, who authored the documents or accuracy of the
17 contents. (FRE§§ 401-404, 901; *United States v Tank* (9th Cir. 2000) 200 F.3d 627, 630-631;
18 *Wady v Provident Life & Accidents Ins. Co. of America* (CD CA 2002) 216 F.Supp.2d 1060,
19 1064-1065.)

20 **OBJECTION NO. 95**

21 **Material Objected to:**

22 “**Exhibit “50”.**” (Declaration of Zachary Hansen, ¶51, lines 25-28.)

23 **Grounds for Objection:**

24 Objection. Irrelevant. Improper character evidence. Lacks foundation. Lacks
25 authenticity. No testimony from any person responsible for creating the internet-based
26 document attesting to how the material was prepared or its accuracy. No personal knowledge of
27 the declarant of who maintains the website, who authored the documents or accuracy of the
28 contents. (FRE§§ 401-404, 901; *United States v Tank* (9th Cir. 2000) 200 F.3d 627, 630-631;

1 *Wady v Provident Life & Accidents Ins. Co. of America* (CD CA 2002) 216 F.Supp.2d 1060,
2 1064-1065.)
3
4

OBJECTION NO. 96

Material Objected to:

6 “Attached hereto as **Exhibit “54”** is a true and correct copy of a transcript prepared at
7 my direction by Plaintiff’s counsel’s office of the audio recording produced by Defendant in
8 discovery titled “HIGHLY CONFIDENTIAL – AUDIO-2021-08-15-10-07-25”. I have
9 reviewed the transcript and listened to the foregoing recording and confirm that the transcript is
10 accurate. Because Defendant designated this exhibit as confidential under the Protective Order
11 (Dkt #63), this is being filed in redacted form in the version filed with the Court’s ECF system,
12 but an unredacted copy is being provided to the Court via email and submission of the paper
13 copy.” (Declaration of Zachary Hansen, ¶55, lines 17-24.)

Grounds for Objection:

15 Objection. Irrelevant. Improper character evidence. Lacks foundation. Lacks
16 authenticity. No testimony from any person responsible for creating the internet-based
17 document attesting to how the material was prepared or its accuracy. No personal knowledge of
18 the declarant of who maintains the website, who authored the documents or accuracy of the
19 contents. No admissible testimony or evidence of transcriber as to the accuracy or correctness
20 of the transcription, despite obvious spelling errors, and gaps in the transcription. (FRE §§ 401-
21 404, 901(a)-(b) and 104(b); *United States v Tank* (9th Cir. 2000) 200 F.3d 627, 630-631;
22 *Wady v Provident Life & Accidents Ins. Co. of America* (CD CA 2002) 216 F.Supp.2d 1060,
23 1064-1065; See *Snyder v CitiSteel USA Inc.* (D. Del. 2007) 508 F.Supp.2d 407, 412-413.)
24
25

OBJECTION NO. 97

Material Objected to:

27 “Attached hereto as **Exhibit “55”** is a true and correct copy of a transcript prepared at
28 my direction by Plaintiff’s counsel’s office of the audio recording produced by Defendant in
49

1 discovery titled "HIGHLY CONFIDENTIAL – AUDIO-2021-08-24-08-46-17". I have
2 reviewed the transcript and listened to the foregoing recording and confirm that the transcript is
3 accurate. Because Defendant designated this exhibit as confidential under the Protective Order
4 (Dkt #63), this is being filed in redacted form in the version filed with the Court's ECF system,
5 but an unredacted copy is being provided to the Court via email and submission of the paper
6 copy." (Declaration of Zachary Hansen, ¶56, lines 1-8.)

7 **Grounds for Objection:**

8 Objection. Irrelevant. Improper character evidence. Lacks foundation. Lacks
9 authenticity. No testimony from any person responsible for creating the internet-based
10 document attesting to how the material was prepared or its accuracy. No personal knowledge of
11 the declarant of who maintains the website, who authored the documents or accuracy of the
12 contents. No admissible testimony or evidence of transcriber as to the accuracy or correctness
13 of the transcription, despite obvious spelling errors, and gaps in the transcription. (FRE §§ 401-
14 404, 901(a)-(b) and 104(b); *United States v Tank* (9th Cir. 2000) 200 F.3d 627, 630-631;
15 *Wady v Provident Life & Accidents Ins. Co. of America* (CD CA 2002) 216 F.Supp.2d 1060,
16 1064-1065; See *Snyder v CitiSteel USA Inc.* (D. Del. 2007) 508 F.Supp.2d 407, 412-413.)

17
18 **OBJECTION NO. 98**

19 **Material Objected to:**

20 "Attached hereto as **Exhibit "56"** is a true and correct copy of a transcript prepared at
21 my direction by Plaintiff's counsel's office of the audio recording produced by Defendant in
22 discovery titled "HIGHLY CONFIDENTIAL – AUDIO-2021-08-24-14-43-38". I have
23 reviewed the transcript and listened to the foregoing recording and confirm that the transcript is
24 accurate. Because Defendant designated this exhibit as confidential under the Protective Order
25 (Dkt #63), this is being filed in redacted form in the version filed with the Court's ECF system,
26 but an unredacted copy is being provided to the Court via email and submission of the paper
27 copy." (Declaration of Zachary Hansen, ¶57, lines 9-16.)

28 **Grounds for Objection:**

1 Objection. Irrelevant. Improper character evidence. Lacks foundation. Lacks
2 authenticity. No testimony from any person responsible for creating the internet-based
3 document attesting to how the material was prepared or its accuracy. No personal knowledge of
4 the declarant of who maintains the website, who authored the documents or accuracy of the
5 contents. No admissible testimony or evidence of transcriber as to the accuracy or correctness
6 of the transcription, despite obvious spelling errors, and gaps in the transcription. (FRE §§ 401-
7 404, 901; 901(a)-(b) and 104(b); *United States v Tank* (9th Cir. 2000) 200 F.3d 627, 630-631;
8 *Wady v Provident Life & Accidents Ins. Co. of America* (CD CA 2002) 216 F.Supp.2d 1060,
9 1064-1065; See *Snyder v CitiSteel USA Inc.* (D. Del. 2007) 508 F.Supp.2d 407, 412-413.)

10

11 **OBJECTION NO. 99**

12 **Material Objected to:**

13 “Attached hereto as **Exhibit “58”** is a true and correct copy of a screenshot I obtained
14 from Amazon.com of Defendant’s book “*The Deep Rig: How Election Fraud Cost Donald J.*
15 *Trump the White House, By a Man Who did not Vote for Him: (or what to send friends who*
16 *ask, “Why do you doubt the integrity of the Election 2020?”*)” for sale and which was produced
17 in discovery by Plaintiff and bates labeled as RHB00710.” (Declaration of Zachary Hansen,
18 ¶59, lines 23-28.)

19 **Grounds for Objection:**

20 Objection. Irrelevant. Improper character evidence. First Amendment. Lacks
21 foundation. Lacks authenticity. No testimony from any person responsible for creating the
22 internet-based document attesting to how the material was prepared or its accuracy. No
23 personal knowledge of the declarant of who maintains the website, who authored the
24 documents or accuracy of the contents. (FRE §§ 401-404, 901; *United States v Tank* (9th Cir.
25 2000) 200 F.3d 627, 630-631; *Wady v Provident Life & Accidents Ins. Co. of America* (CD CA
26 2002) 216 F.Supp.2d 1060, 1064-1065.)

27 **OBJECTION NO. 100**

28 **Material Objected to:**

“Exhibit “58”.” (Declaration of Zachary Hansen, ¶59, lines 23-28.)

Grounds for Objection:

Objection. Irrelevant. Improper character evidence. First Amendment. Lacks foundation. Lacks authenticity. No testimony from any person responsible for creating the internet-based document attesting to how the material was prepared or its accuracy. No personal knowledge of the declarant of who maintains the website, who authored the documents or accuracy of the contents. (FRE §§ 401-404, 901; *United States v Tank* (9th Cir. 2000) 200 F.3d 627, 630-631; *Wady v Provident Life & Accidents Ins. Co. of America* (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)

OBJECTION NO. 101

Material Objected to:

“Attached hereto as **Exhibit “59”** is a true and correct copy of a screenshot I obtained of Defendant’s post on his publicly available X (formerly known as Twitter) account dated April 17, 2023, and which was produced in discovery by Plaintiff and bates labeled as RHB00716.” (Declaration of Zachary Hansen, ¶60, lines 1-4.)

Grounds for Objection:

Objection. Irrelevant. Improper character evidence. First Amendment. Lacks foundation. Lacks authenticity. No testimony from any person responsible for creating the internet-based document attesting to how the material was prepared or its accuracy. No personal knowledge of the declarant of who maintains the website, who authored the documents or accuracy of the contents. (FRE §§ 401-404, 901; *United States v Tank* (9th Cir. 2000) 200 F.3d 627, 630-631; *Wady v Provident Life & Accidents Ins. Co. of America* (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)

OBJECTION NO. 102

Material Objected to:

“Exhibit “59”.” (Declaration of Zachary Hansen, ¶60, lines 1-4.)

III

1 **Grounds for Objection:**

2 Objection. Irrelevant. Improper character evidence. First Amendment. Lacks
3 foundation. Lacks authenticity. No testimony from any person responsible for creating the
4 internet-based document attesting to how the material was prepared or its accuracy. No
5 personal knowledge of the declarant of who maintains the website, who authored the
6 documents or accuracy of the contents. (FRE §§ 401-404, 901; *United States v Tank* (9th Cir.
7 2000) 200 F.3d 627, 630-631; *Wady v Provident Life & Accidents Ins. Co. of America* (CD CA
8 2002) 216 F.Supp.2d 1060, 1064-1065.)

9

10 **OBJECTION NO. 103**

11 **Material Objected to:**

12 “Attached hereto as **Exhibit “60”** is a true and correct copy of a screenshot I obtained
13 of Defendant’s post on his publicly available X (formerly known as Twitter) account dated
14 April 8, 2024, and which was produced in discovery by Plaintiff and bates labeled as
15 RHB00717.” (Declaration of Zachary Hansen, ¶61, lines 5-8.)

16 **Grounds for Objection:**

17 Objection. Irrelevant. Improper character evidence. First Amendment. Lacks
18 foundation. Lacks authenticity. No testimony from any person responsible for creating the
19 internet-based document attesting to how the material was prepared or its accuracy. No
20 personal knowledge of the declarant of who maintains the website, who authored the
21 documents or accuracy of the contents. (FRE §§ 401-404, 901; *United States v Tank* (9th Cir.
22 2000) 200 F.3d 627, 630-631; *Wady v Provident Life & Accidents Ins. Co. of America* (CD CA
23 2002) 216 F.Supp.2d 1060, 1064-1065.)

24 **OBJECTION NO. 104**

25 **Material Objected to:**

26 “**Exhibit “60”.**” (Declaration of Zachary Hansen, ¶61, lines 5-8.)

27 **Grounds for Objection:**

28 Objection. Irrelevant. Improper character evidence. First Amendment. Lacks
53

1 foundation. Lacks authenticity. No testimony from any person responsible for creating the
2 internet-based document attesting to how the material was prepared or its accuracy. No
3 personal knowledge of the declarant of who maintains the website, who authored the
4 documents or accuracy of the contents. (FRE §§ 401-404, 901; *United States v Tank* (9th Cir.
5 2000) 200 F.3d 627, 630-631; *Wady v Provident Life & Accidents Ins. Co. of America* (CD CA
6 2002) 216 F.Supp.2d 1060, 1064-1065.)

7

8 **OBJECTION NO. 105**

9 **Material Objected to:**

10 “Attached hereto as **Exhibit “61”** is a true and correct copy of a screenshot I obtained
11 of Defendant’s post on his publicly available X (formerly known as Twitter) account dated
12 January 5, 2023, and which was produced in discovery by Plaintiff and bates labeled as
13 RHB00718.” (Declaration of Zachary Hansen, ¶62, lines 9-12.)

14 **Grounds for Objection:**

15 Objection. Irrelevant. Improper character evidence. First Amendment. Lacks
16 foundation. Lacks authenticity. No testimony from any person responsible for creating the
17 internet-based document attesting to how the material was prepared or its accuracy. No
18 personal knowledge of the declarant of who maintains the website, who authored the
19 documents or accuracy of the contents. (FRE §§ 401-404, 901; *United States v Tank* (9th Cir.
20 2000) 200 F.3d 627, 630-631; *Wady v Provident Life & Accidents Ins. Co. of America* (CD CA
21 2002) 216 F.Supp.2d 1060, 1064-1065.)

22 **OBJECTION NO. 106**

23 **Material Objected to:**

24 “**Exhibit “61”.**” (Declaration of Zachary Hansen, ¶62, lines 9-12.)

25 **Grounds for Objection:**

26 Objection. Irrelevant. Improper character evidence. First Amendment. Lacks
27 foundation. Lacks authenticity. No testimony from any person responsible for creating the
28 internet-based document attesting to how the material was prepared or its accuracy. No

1 personal knowledge of the declarant of who maintains the website, who authored the
2 documents or accuracy of the contents. (FRE §§ 401-404, 901; *United States v Tank* (9th Cir.
3 2000) 200 F.3d 627, 630-631; *Wady v Provident Life & Accidents Ins. Co. of America* (CD CA
4 2002) 216 F.Supp.2d 1060, 1064-1065.)

5 **OBJECTION NO. 107**

6 **Material Objected to:**

7 “Attached hereto as **Exhibit “62”** is a true and correct copy of a screenshot I obtained
8 of Defendant’s post on his publicly available X (formerly known as Twitter) account dated
9 June 25, 2023, and which was produced in discovery by Plaintiff and bates labeled as
10 RHB00719.” (Declaration of Zachary Hansen, ¶63, lines 13-16.)

11 **Grounds for Objection:**

12 Objection. Irrelevant. Improper character evidence. First Amendment. Lacks
13 foundation. Lacks authenticity. No testimony from any person responsible for creating the
14 internet-based document attesting to how the material was prepared or its accuracy. No
15 personal knowledge of the declarant of who maintains the website, who authored the
16 documents or accuracy of the contents. (FRE §§ 401-404, 901; *United States v Tank* (9th Cir.
17 2000) 200 F.3d 627, 630-631; *Wady v Provident Life & Accidents Ins. Co. of America* (CD CA
18 2002) 216 F.Supp.2d 1060, 1064-1065.)

19 **OBJECTION NO. 108**

20 **Material Objected to:**

21 “**Exhibit “62”.**” (Declaration of Zachary Hansen, ¶63, lines 13-16.)

22 **Grounds for Objection:**

23 Objection. Irrelevant. Improper character evidence. First Amendment. Lacks
24 foundation. Lacks authenticity. No testimony from any person responsible for creating the
25 internet-based document attesting to how the material was prepared or its accuracy. No
26 personal knowledge of the declarant of who maintains the website, who authored the
27 documents or accuracy of the contents. (FRE §§ 401-404, 901; *United States v Tank* (9th Cir.
28 2000) 200 F.3d 627, 630-631; *Wady v Provident Life & Accidents Ins. Co. of America* (CD CA
55

1 2002) 216 F.Supp.2d 1060, 1064-1065.)
2
3

OBJECTION NO. 109

Material Objected to:

5 “Attached hereto as **Exhibit “63”** is a true and correct copy of a screenshot I obtained
6 of Defendant’s post on his publicly available X (formerly known as Twitter) account dated
7 May 10, 2023, and which was produced in discovery by Plaintiff and bates labeled as
8 RHB00720.” (Declaration of Zachary Hansen, ¶64, lines 17-20.)

Grounds for Objection:

10 Objection. Irrelevant. Improper character evidence. First Amendment. Lacks
11 foundation. Lacks authenticity. No testimony from any person responsible for creating the
12 internet-based document attesting to how the material was prepared or its accuracy. No
13 personal knowledge of the declarant of who maintains the website, who authored the
14 documents or accuracy of the contents. (FRE §§ 401-404, 901; *United States v Tank* (9th Cir.
15 2000) 200 F.3d 627, 630-631; *Wady v Provident Life & Accidents Ins. Co. of America* (CD CA
16 2002) 216 F.Supp.2d 1060, 1064-1065.)

OBJECTION NO. 110

Material Objected to:

19 “**Exhibit “63”.**” (Declaration of Zachary Hansen, ¶64, lines 17-20.)

Grounds for Objection:

21 Objection. Irrelevant. Improper character evidence. First Amendment. Lacks
22 foundation. Lacks authenticity. No testimony from any person responsible for creating the
23 internet-based document attesting to how the material was prepared or its accuracy. No
24 personal knowledge of the declarant of who maintains the website, who authored the
25 documents or accuracy of the contents. (FRE §§ 401-404, 901; *United States v Tank* (9th Cir.
26 2000) 200 F.3d 627, 630-631; *Wady v Provident Life & Accidents Ins. Co. of America* (CD CA
27 2002) 216 F.Supp.2d 1060, 1064-1065.)

OBJECTION NO. 111

Material Objected to:

“Attached hereto as **Exhibit “64”** is a true and correct copy of a screenshot I obtained of Defendant’s post on his publicly available X (formerly known as Twitter) account dated January 7, 2023, and which was produced in discovery by Plaintiff and bates labeled as RHB00721.” (Declaration of Zachary Hansen, ¶65, lines 21-24.)

Grounds for Objection:

Objection. Irrelevant. Improper character evidence. First Amendment. Lacks foundation. Lacks authenticity. No testimony from any person responsible for creating the internet-based document attesting to how the material was prepared or its accuracy. No personal knowledge of the declarant of who maintains the website, who authored the documents or accuracy of the contents. (FRE §§ 401-404, 901; *United States v Tank* (9th Cir. 2000) 200 F.3d 627, 630-631; *Wady v Provident Life & Accidents Ins. Co. of America* (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)

OBJECTION NO. 112

Material Objected to:

“Exhibit “64”.” (Declaration of Zachary Hansen, ¶65, lines 21-24.)

Grounds for Objection:

Objection. Irrelevant. Improper character evidence. First Amendment. Lacks foundation. Lacks authenticity. No testimony from any person responsible for creating the internet-based document attesting to how the material was prepared or its accuracy. No personal knowledge of the declarant of who maintains the website, who authored the documents or accuracy of the contents. (FRE §§ 401-404, 901; *United States v Tank* (9th Cir. 2000) 200 F.3d 627, 630-631; *Wady v Provident Life & Accidents Ins. Co. of America* (CD CA 2002) 216 F.Supp.2d 1060, 1064-1065.)

OBJECTION NO. 113

Material Objected to:

"Attached hereto as **Exhibit "65"**" is a true and correct copy of a screenshot I obtained

1 of Defendant's post on his publicly available X (formerly known as Twitter) account dated
2 October 26, 2024, and which was produced in discovery by Plaintiff and bates labeled as
3 RHB00706." (Declaration of Zachary Hansen, ¶66, lines 25-28.)

4 **Grounds for Objection:**

5 Objection. Irrelevant. Improper character evidence. First Amendment. Hearsay.
6 Lacks foundation. Lacks authenticity. No testimony from any person responsible for creating
7 the internet-based document attesting to how the material was prepared or its accuracy. No
8 personal knowledge of the declarant of who maintains the website, who authored the
9 documents or accuracy of the contents. (FRE §§ 401-404, 801, 901; *United States v Tank* (9th
10 Cir. 2000) 200 F.3d 627, 630-631; *Wady v Provident Life & Accidents Ins. Co. of America* (CD
11 CA 2002) 216 F.Supp.2d 1060, 1064-1065.)

12 **OBJECTION NO. 114**

13 **Material Objected to:**

14 "Exhibit "65" " (Declaration of Zachary Hansen, ¶66, lines 25-28.)

15 **Grounds for Objection:**

16 Objection. Irrelevant. Improper character evidence. First Amendment. Hearsay.
17 Lacks foundation. Lacks authenticity. No testimony from any person responsible for creating
18 the internet-based document attesting to how the material was prepared or its accuracy. No
19 personal knowledge of the declarant of who maintains the website, who authored the
20 documents or accuracy of the contents. (FRE §§ 401-404, 801, 901; *United States v Tank* (9th
21 Cir. 2000) 200 F.3d 627, 630-631; *Wady v Provident Life & Accidents Ins. Co. of America* (CD
22 CA 2002) 216 F.Supp.2d 1060, 1064-1065.)

23
24 **OBJECTION NO. 115**

25 **Material Objected to:**

26 "Attached hereto as Exhibit "66" is a true and correct copy of a screenshot I obtained
27 of Defendant's publicly available X (formerly known as Twitter) account on October 30, 2024,
28 and which was produced in discovery by Plaintiff and bates labeled as RHB00707."
⁵⁸

**EVIDENTIARY OBJECTIONS TO PLAINTIFF'S DECLARATION AND EXHIBITS FILED IN SUPPORT OF
PLAINTIFF'S OPPOSITION TO DEFENDANT'S MOTION FOR SUMMARY JUDGMENT**

Case No. 2:23-cv-09430-SVW-PD

1 (Declaration of Zachary Hansen, ¶67, lines 1-4.)

2 **Grounds for Objection:**

3 Objection. Irrelevant. Improper character evidence. First Amendment. Lacks
4 foundation. Lacks authenticity. No testimony from any person responsible for creating the
5 internet-based document attesting to how the material was prepared or its accuracy. No
6 personal knowledge of the declarant of who maintains the website, who authored the
7 documents or accuracy of the contents. (FRE §§ 401-404, 901; *United States v Tank* (9th Cir.
8 2000) 200 F.3d 627, 630-631; *Wady v Provident Life & Accidents Ins. Co. of America* (CD CA
9 2002) 216 F.Supp.2d 1060, 1064-1065.)

10
11 **OBJECTION NO. 116**

12 **Material Objected to:**

13 “Exhibit “66”.” (Declaration of Zachary Hansen, ¶67, lines 1-4.)

14 **Grounds for Objection:**

15 Objection. Irrelevant. Improper character evidence. First Amendment. Lacks
16 foundation. Lacks authenticity. No testimony from any person responsible for creating the
17 internet-based document attesting to how the material was prepared or its accuracy. No
18 personal knowledge of the declarant of who maintains the website, who authored the
19 documents or accuracy of the contents. (FRE §§ 401-404, 901; *United States v Tank* (9th Cir.
20 2000) 200 F.3d 627, 630-631; *Wady v Provident Life & Accidents Ins. Co. of America* (CD CA
21 2002) 216 F.Supp.2d 1060, 1064-1065.)

22
23 **OBJECTION NO. 117**

24 **Material Objected to:**

25 “Attached hereto as Exhibit “67” is a true and correct copy of a screenshot I obtained
26 of the website <https://enemywithindocuseries.com/> which advertises Defendant’s mini-series
27 “The Enemy Within”, and which was produced in discovery by Plaintiff and bates labeled as
28 RHB00708.” (Declaration of Zachary Hansen, ¶68, lines 5-8.)

1 **Grounds for Objection:**

2 Objection. Irrelevant. Improper character evidence. First Amendment. Lacks
3 foundation. Lacks authenticity. No testimony from any person responsible for creating the
4 internet-based document attesting to how the material was prepared or its accuracy. No
5 personal knowledge of the declarant of who maintains the website, who authored the
6 documents or accuracy of the contents. (FRE §§ 401-404, 901; *United States v Tank* (9th Cir.
7 2000) 200 F.3d 627, 630-631; *Wady v Provident Life & Accidents Ins. Co. of America* (CD CA
8 2002) 216 F.Supp.2d 1060, 1064-1065.)

9 **OBJECTION NO. 118**

10 **Material Objected to:**

11 “Exhibit “67”.” (Declaration of Zachary Hansen, ¶68, lines 5-8.)

12 **Grounds for Objection:**

13 Objection. Irrelevant. Improper character evidence. First Amendment. Lacks
14 foundation. Lacks authenticity. No testimony from any person responsible for creating the
15 internet-based document attesting to how the material was prepared or its accuracy. No
16 personal knowledge of the declarant of who maintains the website, who authored the
17 documents or accuracy of the contents. (FRE §§ 401-404, 901; *United States v Tank* (9th Cir.
18 2000) 200 F.3d 627, 630-631; *Wady v Provident Life & Accidents Ins. Co. of America* (CD CA
19 2002) 216 F.Supp.2d 1060, 1064-1065.)

20
21 **OBJECTION NO. 119**

22 **Material Objected to:**

23 “Attached hereto as Exhibit “68” is a true and correct copy of an email chain between
24 Defendant’s counsel of record and myself, with Plaintiff’s other counsel of record copied
25 thereon, between September 6, 2024 and September 11, 2024. In this email chain, my meet and
26 confer discussions with Defendant’s counsel of record regarding the scheduling of Defendant’s
27 deposition and the location are set forth. This includes a detailed summary of my meet and
28 confer conference call with Defendant’s counsel of record, Michael Murphy, on September 2,
60

EVIDENTIARY OBJECTIONS TO PLAINTIFF’S DECLARATION AND EXHIBITS FILED IN SUPPORT OF
PLAINTIFF’S OPPOSITION TO DEFENDANT’S MOTION FOR SUMMARY JUDGMENT

Case No. 2:23-cv-09430-SVW-PD

1 2024, in which he offered to find a location for Defendant's deposition to take place in Florida,
2 USA. Then on September 11, 2024, when Defendant's attorney of record stated any in-person
3 deposition of Defendant would have to be in Dubai or via zoom from Dubai, which Plaintiff
4 had an issue with because of the time it takes to travel to Dubai and, upon legal research, the
5 legality of a deposition in Dubai and lack of legal authority authorizing a deposition to occur in
6 Dubai for use in a District Court case in the United States. Since September 11, 2024, the
7 scheduling of Defendant's deposition and the location thereof has been the subject of two
8 different Informal Discovery Conferences on September 18, 2024, and October 4, 2024. (See
9 Docket #67, 79.) This issue was also the subject of a discovery motion that was filed on
10 October 9, 2024, and which the Court ruled on October 30, 2024, that Defendant would be
11 required to return to the United States for his deposition before trial and was required to inform
12 Plaintiff's counsel by November 4, 2024, what federal district he will choose to appear for his
13 deposition in. (See Docket #87.) Defendant's deposition has not yet occurred due to the
14 foregoing discovery disputes." (Declaration of Zachary Hansen, ¶69 page 13, lines 9-28
15 through page 14, lines 1-2.)

16 **Grounds for Objection:**

17 Objection. Irrelevant. Improper character evidence. Rule of Completeness.
18 (FRE §§ 106, 401-404.)

19 **OBJECTION NO. 120**

20 **Material Objected to:**

21 "In discovery motions in this litigation, Defendant gave wild and differing claims about
22 why he was residing in Dubai. First, Defendant's counsel said he was informed by an
23 unidentified DEA agent that the Venezuelan government placed a \$25 million bounty on him
24 and he did not want to return to the United States due to safety issues. (See Docket #67.) Then
25 Defendant claimed in a declaration that he was in Ghana cooperating with an official with the
26 Ghanaian Ministry of Security who informed Defendant that criminals in West Africa were
27 cooperating to get him in a position where he could be kidnapped. (See Docket #76.)."

28 (Declaration of Zachary Hansen, ¶70, lines 3-10.)

61

EVIDENTIARY OBJECTIONS TO PLAINTIFF'S DECLARATION AND EXHIBITS FILED IN SUPPORT OF
PLAINTIFF'S OPPOSITION TO DEFENDANT'S MOTION FOR SUMMARY JUDGMENT

Case No. 2:23-cv-09430-SVW-PD

1 **Grounds for Objection:**

2 Objection. Irrelevant. Improper character evidence. Rule of Completeness.
3 (FRE§§ 106, 401-404.)

4
5 **OBJECTION NO. 121**

6 **Material Objected to:**

7 “Attached hereto as **Exhibit “69”** is a true and correct copy of an email that
8 Defendant’s counsel of record, Michael Murphy, sent to me on August 17, 2024.” (Declaration
9 of Zachary Hansen, ¶71, lines 11-12.)

10 **Grounds for Objection:**

11 Objection. Irrelevant. Improper character evidence. Rule of Completeness.
12 (FRE§§ 106, 401-404.)

13 **OBJECTION NO. 122**

14 **Material Objected to:**

15 “**Exhibit “69”.**” (Declaration of Zachary Hansen, ¶71, lines 11-12.)

16 **Grounds for Objection:**

17 Objection. Irrelevant. Improper character evidence. Rule of Completeness.
18 (FRE§§ 106, 401-404.)

19
20 **OBJECTION NO. 123**

21 **Material Objected to:**

22 “Attached hereto as Exhibit “70” is a true and correct copy of an email that Defendant’s
23 counsel of record, Michael Murphy, sent to me on September 30, 2024.” (Declaration of
24 Zachary Hansen, ¶72, lines 13-15.)

25 **Grounds for Objection:**

26 Objection. Irrelevant. Improper character evidence. Rule of Completeness.
27 (FRE§§ 106, 401-404.)

OBJECTION NO. 124

Material Objected to:

“Exhibit “70”.” (Declaration of Zachary Hansen, ¶72, lines 13-15.)

Grounds for Objection:

Objection. Irrelevant. Improper character evidence. Rule of Completeness.
(FRE §§ 106, 401-404.)

Dated: November 12, 2024

LAW OFFICES OF MICHAEL C. MURPHY

By: /s/ Michael C. Murphy, Esq.

Michael C. Murphy, Esq.
Michael C. Murphy, Jr., Esq.
Attorneys for Defendant,
Patrick Byrne